Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 6/7/2022 8:46:13 PM
To: michael.tan@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Michael,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We are reviewing your question and will contact you with a response as soon as possible.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Gordon
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: michael.tan@byd.com <michael.tan@byd.com>
Sent: Friday, June 3, 2022 3:12 PM
To: CleanSchoolBus <CleanSchoolBus@epa.gov>
Cc: Patrick.duan@byd.com <Patrick.duan@byd.com>; stella.li@byd.com <stella.li@byd.com>
Subject: EPA CSB FAQs, Webinars, technical support, Rebate programs from BYD

Dear Karl,

How are you ? I am excited to watch your webinars on June 2nd , it's great program to bring zero emission to our next generations.

My name is Michael Tan from BYD US, we are the largest electric vehicle manufacturer in China, with market cap about 150 Billon USD, one of key shareholder is Warren Buffet, the key point is that we also have manufacturer facilities based on Lancaster city , mainly focus on electric bus, especially for electric school buses, with annual production capacity 1500 units and hired 800 employees locally.

In order to participate this green program , I here attached our electric school bus specification as for your reference, I would like have a chance to meet you with our engineer team, to check all the technical details in order to full fit all requirements of CSB program, also get to known more deeply for the federal and state level of policies, BYD have the same mission with EPA to bring the zero emission technologies to our next generation, hope we can work tightly with EPA to make this come true , thanks.

Looking forward to your reply.

Michael Tan / Regional Sales Director

BYD North America
1800 S Figueroa St, Los Angeles, CA 90015
(213) 748-3980 ext. 58857

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 5/17/2022 9:23:18 PM
To: steven.gao@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Steven,

Thank you for your interest in EPA's Clean School Bus Program. The final program guidance is still under development and we are unable to release the full program details at this time.

EPA will post detailed information and program announcements on the Clean School Bus website at https://www.epa.gov/cleanschoolbus as information becomes available. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Thank you,
Maddie
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: steven.gao@byd.com <steven.gao@byd.com>
Sent: Tuesday, May 17, 2022 4:53 PM
To: CleanSchoolBus <CleanSchoolBus@epa.gov>
Cc: jason.yan@byd.com; susannah.song@byd.com
Subject: Steven from BYD: Eligibility Application & Implementation Manual for Clean School Bus Program

Dear Clean School Bus team,

Hope this email finds you well.

This is Steven from BYD. Nice to e-meet you.

I joined a couple meetings in the past few weeks and we are very exciting about the upcoming application. To get prepare for participation, I wonder if there are any eligibility applications for the bus model to be enrolled into the program, so school districts can review and get to know our products as their options?

Meanwhile, I'm wondering if there are any implementation manual that will be released soon so we can start to get prepare since we are already in the mid of May?

Thank you very much for your time and kind support.

With Best Regards,

Steven Gao / Marketing Associate

BYD Motors
1800 S Figueroa St, Los Angeles, CA
O: (213) 748 - 3980 ext. 58873
M: (213) 675 - 1285

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/2/2022 6:21:27 PM
To: susannah.song@byd.com
Subject: Thank you for contacting EPA's Clean School Bus Program

Dear Susannah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered your question below.

Question: *Who is eligible to apply?*
Answer: Eligible entities include:

1. State and local governmental entities that provide bus service, including public school districts.
    a. Public charter schools with an NCES District ID are eligible to apply directly for funding.
    b. Most State governmental entities would not be eligible to apply because few provide school bus service, but some own bus fleets and would be eligible.
2. Eligible contractors - Eligible contractors are for-profit, not-for-profit, or nonprofit entities that have the capacity to (1) sell clean or ZE school buses or related charging or fueling infrastructure to school bus owners or (2) arrange financing for such a sale.
    a. For the purpose of defining an eligible contractor, financing is defined as loans or lease-to-own agreements. For example, school bus dealers and original equipment manufacturers (OEMs) that meet these criteria are eligible contractors.
3. Nonprofit school transportation associations
4. Indian tribes, tribal organizations, or tribally controlled schools responsible for the purchase of school buses or providing school bus service for a Bureau of Indian Affairs (BIA) funded school.

Question: May an OEM apply on behalf of the school district? If so, should the OEM register that school district as a new entity on its SAM.gov account?
Answer: A bus or electric vehicle charger OEM that meet the eligible applicant criteria can apply directly and would need to list the school district that would be served by the new buses on their application. The OEM must notify and receive approval from the participating school district prior to submitting the application. Only the direct applicant needs an active SAM.gov entity registration.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Gordon
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/24/2022 6:18:41 PM
To: susannah.song@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Susannah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered your question below.

5.9: *Will submitted applications be publicly available? Will submitted applications be subject to Freedom of Information Act requests?*
Answer: Applications will not be publicly available. The Agency protects competitive proposals/applications from disclosure under applicable provisions of the Freedom of Information Act prior to the completion of the competitive selection process.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Ansley
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Tuesday, August 23, 2022 8:16 PM
To: cleanschoolbus@erg.com; CleanSchoolBus <CleanSchoolBus@epa.gov>
Subject: EPA Clean School Bus Program Applicant Information

Hello EPA Team,

Hope you're doing well.

Since the EPA Clean School Bus Program application is ended, we were wondering if the applicant information is open to public? If yes, how can I get the list of applicant?

Thank you very much, and we are looking forward to your reply.

Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 11/2/2022 5:04:52 PM
To: angel.yin@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Angel,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We are reviewing your question and will contact you with a response as soon as possible.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Ansley
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: angel.yin@byd.com <angel.yin@byd.com>
Sent: Tuesday, November 1, 2022 1:33 PM
To: R7 Actionline <R7Actionline@epa.gov>; Doolan, Stephanie <Doolan.Stephanie@epa.gov>; Crable, Gregory <Crable.Gregory@epa.gov>; Doolan, Stephanie <Doolan.Stephanie@epa.gov>
Cc: CleanSchoolBus <CleanSchoolBus@epa.gov>; susannah.song@byd.com; jason.yan@byd.com; jason.shi@byd.com
Subject: Question Regarding IOWA EPA Clean School Bus

Dear Ms. McCollister,

My name is Angel Yin and I'm a policy analyst with BYD Coach & Bus. We are a ZEV school bus manufacturer in California. Congratulations to Region 7's success on securing and receiving funding from the Clean School Bus Rebate Program! We are partnering with school districts in Region 7 to bring electric school buses and helping advance the clean air efforts.

Both the school districts and us are having questions regarding the requirements for school bus purchase through a dealership.

1. Does the EPA Clean School Bus rebate follows state law on purchasing the school bus through a dealership, or school districts could purchase it directly through OEM?
2. If the school districts require external funding to cover the same bus being awarded, does it have to go through the dealership requirement?

Thanks and look forward to your reply!

Best,

Angel Yin / Policy Analyst

BYD America
1800 S Figueroa St, Los Angeles, CA
(213) 748-3980 x 58668

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/17/2022 7:12:58 PM
To: Michelle.wang@byd.com
CC: susannah.song@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Michelle,

Thank you for contacting EPA's 2022 Clean School Bus Rebates. We have reverted your submitted application (Form ID: 62f2c0711bbad93b39b19bd6) back to draft.

Please resubmit your application as soon as possible to avoid potential submission issues close to the 8/19 deadline.

Regards,
Campbell
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: Michelle.wang@byd.com <Michelle.wang@byd.com>
Sent: Wednesday, August 17, 2022 2:31 PM
To: cleanschoolbus@erg.com
Cc: susannah.song@byd.com
Subject: Recall EPA Application
Importance: High

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Hello EPA Team,

Hope you're doing well.

We just submit the EPA Clean School Bus Application and realize the model of replacing bus need to be updated. We applied 7 type D electric buses, and would like to adjust to 4 Type D electric buses and 3 Type A electric buses. Could you please turn back our application to draft, and let us submit again? Here is our application information:

UEI: TFKMDMWYZLJ3
EFT Indicator: 0000
Applicant: BYD COACH & BUS LLC
School District: Sulphur Springs Union
NCES ID: 0638220
Updated By: michelle.wang@byd.com
Date Updated: 8/16/2022
Status: submitted
Application ID: 62f2c0711bbad93b39b19bd6

Thank you so much for your help and we are looking forward to your reply.

Michelle Wang | Assistant Controller | BYD Motors LLC
1800 S. Figueroa Street, Los Angeles, CA 90015
Office: (213) 748-3980 ext. 58824
Email: michelle.wang@byd.com;
http://www.byd.com

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/17/2022 2:38:17 PM
To: susannah.song@byd.com
CC: Perez, Esperanza [Perez.Esperanza@epa.gov]
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Susannah,

Upon reviewing your request, we see that Michelle Wang submitted the application. The application submitter, Michelle Wang, must request the reversion of your submitted application in order for us to move forward with the request.

Regards,
Ansley
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Tuesday, August 16, 2022 4:39 PM
To: cleanschoolbus@erg.com
Cc: R9cleanschoolbus <R9cleanschoolbus@epa.gov>; jason.yan@byd.com; Danielle Cuevas <dcuevas@sssd.k12.ca.us>
Subject: Application Amendment Request - EPA Clean School Bus Rebate Program

Hello EPA Team,

Hope you're doing well.

We just submit the EPA Clean School Bus Application and realize the model of replacing bus need to be updated. We applied 7 type D electric buses, and would like to adjust to 4 Type D electric buses and 3 Type A electric buses. Could you please turn back our application to draft, and let us submit again? Here is our application information:

UEI	TFKMDMWYZLJ3
EFT Indicator	0000
Applicant	BYD COACH & BUS LLC
School District	Sulphur Springs Union
NCES ID	0638220
Updated By	michelle.wang@byd.com
Date Updated	8/16/2022
Status	submitted
Application ID	62f2c0711bbad93b39b19bd6

Thank you so much for your help and we are looking forward to your reply.

Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

From: 010a0182a82041f7-225f1dd2-e5a7-4c62-a2b8-bffdac4cfe8e-000000@us-gov-west-1.amazonses.com [mailto:010a0182a82041f7-225f1dd2-e5a7-4c62-a2b8-bffdac4cfe8e-000000@us-gov-west-1.amazonses.com] **On Behalf Of** no-reply@forms.gov
Sent: Tuesday, August 16, 2022 12:28 PM
To: susannah.song@byd.com
Subject: Application Submitted to EPA: Clean School Bus Rebate Program

EPA Clean School Bus Program - Rebate Application

An application was submitted to the U.S. EPA's 2022 Clean School Bus Rebates program for financial assistance to replace existing school buses with zero emission and/or clean school buses. Information about the application can be found below.

You are receiving this email confirmation because you signed and submitted the application, or you were identified as the Primary or Alternate Contact on the application form. We plan to select applicants by lottery within the time frame posted at https://www.epa.gov/cleanschoolbus/school-bus-rebates-clean-school-bus-program.

Alternatively, if you are a Government Business (or alternate) or Electronic Business (or alternate) Point of Contact in SAM.gov for your application, you can login to your applicant dashboard to view your application status as well as view the application you submitted at https://app.epa.gov/csb.

If you are selected, you will be notified by the Clean School Bus Program. Public lists of selected and unselected applicants will also be posted at the previous link.

If you have questions, please review the School Bus Rebates: Clean School Bus Program webpage for program guidance, including a Question and Answer (Q&A) document.

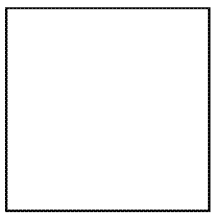
You can also contact the Clean School Bus Help Desk at cleanschoolbus@epa.gov.

Application Information:
UEI: TFKMDMWYZLJ3
EFT: 0000

Applicant: BYD COACH & BUS LLC
School District Name: Sulphur Springs Union
Date of Submission: 2022-08-16T19:27:40.878Z

Application/Form ID: 62f2c0711bbad93b39b19bd6
Submitter Name: MICHELLE WANG
Submitter Email: michelle.wang@byd.com

Powered by



Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/16/2022 9:16:47 PM
To: susannah.song@byd.com; R9cleanschoolbus [R9cleanschoolbus@epa.gov]
CC: jason.yan@byd.com; steven.gao@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Sussanah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered questions similar to yours below.

Question: 9.1: *Do old buses have to be scrapped?*
Answer: Eligible 2010 or older buses being replaced must be scrapped. Fleets that do not have eligible vehicle model year 2010 or older diesel buses to scrap and that choose to instead replace 2011 or newer buses by donating or selling those buses **must retain documentation of that transaction**. See Section 9 of the Program Guide for additional information.

3.6: *Is a bus already on order eligible as a replacement bus?*
Answer: No. **Buses must not be ordered prior to receiving official notification of selection for EPA funding.**

3.38: *Can we apply for buses that will begin service in the 2023-24 school year in this year's application?*
Answer: Yes. **The deadline for selectees to receive new buses, install eligible charging infrastructure, replace old buses, and submit Close Out Forms is the end of the project period in October 2024**.

9.6: *How long after school districts have taken possession of the new replacement bus must they scrap the diesel bus?*
Answer: Fleets must replace old buses by the end of the project period, but there can be overlap between receiving new buses and replacing old buses.

5.35: *Is the applicant required to submit a quote with their application?*
Answer: No.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

Be advised, the 2022 Clean School Bus Rebates application deadline is **August 19, 2022, at 11:59pm ET**. Your SAM.gov entity registration must be active and include your Points of Contact (POCs) before 8/16/22. If your SAM.gov entity registration is not active (or does not have the appropriate POCs) by 8/16/22, it may not be possible to access the rebate application form before the 8/19/22 deadline.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Campbell
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Tuesday, August 16, 2022 2:15 PM
To: 'R9cleanschoolbus' <R9cleanschoolbus@epa.gov>; cleanschoolbus@erg.com
Cc: jason.yan@byd.com; steven.gao@byd.com
Subject: EPA's Clean School Bus Program - Question regarding Replacement Bus Newer than 2010

Hello Team,

For the EPA clean school bus fund, one of our customers would like to replace the 2023 model 'old' school buses with the new electric buses. Since EPA requires them to be donating or selling the old school bus which is newer than 2011, during the application process, do we need to submit any supporting document for the approval of donation and selling?

Thank you very much and we are looking forward to your reply.

Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 7/25/2022 2:26:02 PM
To: Susannah.song@byd.com
Subject: Thank you for contacting EPA's Clean School Bus Program

Dear Susannah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We are reviewing your question and will contact you with a response as soon as possible.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Gordon
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: Moltzen, Michael <Moltzen.Michael@epa.gov>
Sent: Friday, July 22, 2022 4:35 PM
To: susannah.song@byd.com; CleanSchoolBus <CleanSchoolBus@epa.gov>
Cc: michael.tan@byd.com; jason.yan@byd.com; ricardo.morales@byd.com; Maria.mendoza1@byd.com; gerald.farrell@byd.com
Subject: RE: Questions regarding EPA School Bus Funding Application

Hi Susannah,

Thanks for checking in with your questions about Clean School Bus Rebates. I'm looping in our help line (cleanschoolbus@epa.gov). I believe its likely you're an eligible applicant, and will likely need to be registered in sam.gov; however, the school district(s) you're working with likely would not need to be. However, its best to confirm with folks who operate our helpline.

Mike Moltzen, Deputy Director
Transportation and Climate Division
EPA Office of Transportation and Air Quality
(734) 249-2869
Pronouns: he, him, his

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Thursday, July 21, 2022 2:03 PM
To: Moltzen, Michael <Moltzen.Michael@epa.gov>
Cc: michael.tan@byd.com; jason.yan@byd.com; ricardo.morales@byd.com; Maria.mendoza1@byd.com; gerald.farrell@byd.com
Subject: Questions regarding EPA School Bus Funding Application

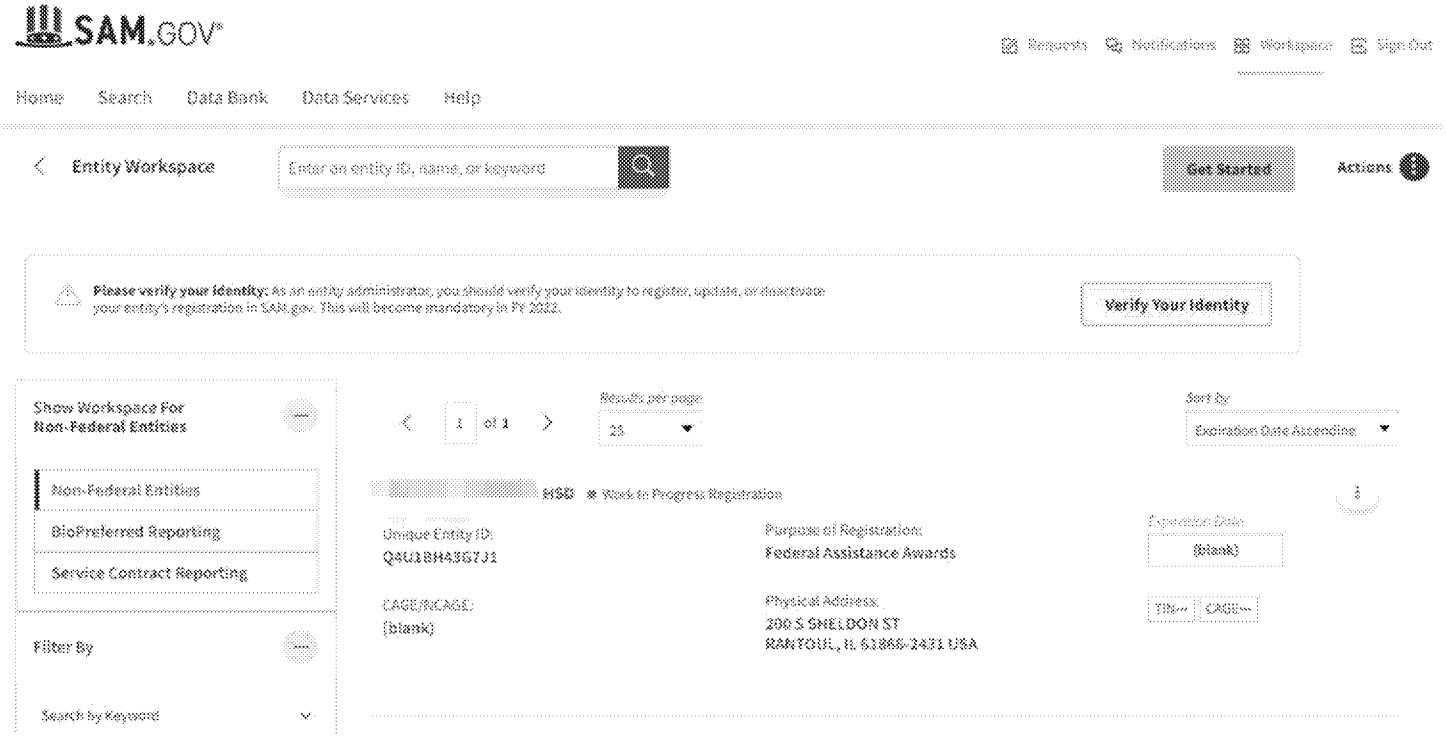
Hello Michael,

Hope you are doing well.

Allow me to introduce myself, I am Susannah Song, with BYD Coach & Bus, a U.S.-based electric vehicle manufacturer. Currently, we are applying for the EPA's new Clean School Bus Program funding on behave of our client (school district) and have some questions regarding the funding application. Hope you could help us to answer, thank you:

1. Is OEM able to apply the funding for the school district?
2. If yes, should we register the school district as a new entity on our sam.gov? (Please see the below image for your reference)
3. If yes, do we need to get all the entity information, including but not limited to financial information, Executive Compensation Questions, Representation and certifications, etc.?

Thank you very much for your time in this effort, we are looking forward to your reply.



Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/3/2022 6:46:59 PM
To: susannah.song@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Susannah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered your question below.

Question: *Why do I see an error message stating, "**No SAM.gov records match your email**" when trying to access the rebate application form?*
Answer: If you receive this error message, please confirm that:

1. The organization you intend to apply for is actively registered as an entity on SAM.gov and has a Unique Entity Identifier (UEI).
2. You are listed as one of the following four Points of Contact (POC) in your organization's entity registration on SAM.gov:
    a. Electronic Business POC
    b. Alternate Electronic Business POC
    c. Government Business POC
    d. Alternate Government Business POC
3. The login.gov account you are using to access the rebate application form uses the exact same email address as is listed in your POC information in your organization's SAM.gov entity registration.

Note: If you update the POC information in your organization's SAM.gov entity registration, there may be a delay of 1-2 business days before that change will be reflected on the Clean School Bus Rebate Forms site.

If you are still seeing this error message, you meet all three requirements above, and it has been more than 2 business days since updating your SAM.gov information, then please reply back with your organization's name, 12-character UEI, and the name and email of the user trying to access the application form. We can then investigate the issue.

Please see the Online Rebate Application Information page for more detailed information on prerequisites for accessing the application, a User Guide for the application form, and resources for help with SAM.gov.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Megan
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Wednesday, August 3, 2022 12:32 PM
To: cleanschoolbus@erg.com

Cc: enid.santiago@byd.com; jason.yan@byd.com; steven.gao@byd.com
Subject: RE: Thank you for contacting EPA's Clean School Bus Program

Hello Team,

Thanks for your reply.

The problem is we stuck at the log in page. After we log in to our company Sam.gov account, and with the account credential to log in the EPA application log in, it's stuck at the below page all the time. May I know how to solve the problem?

Here is our company information:

BYD Coach & Bus LLC (Active Registration)

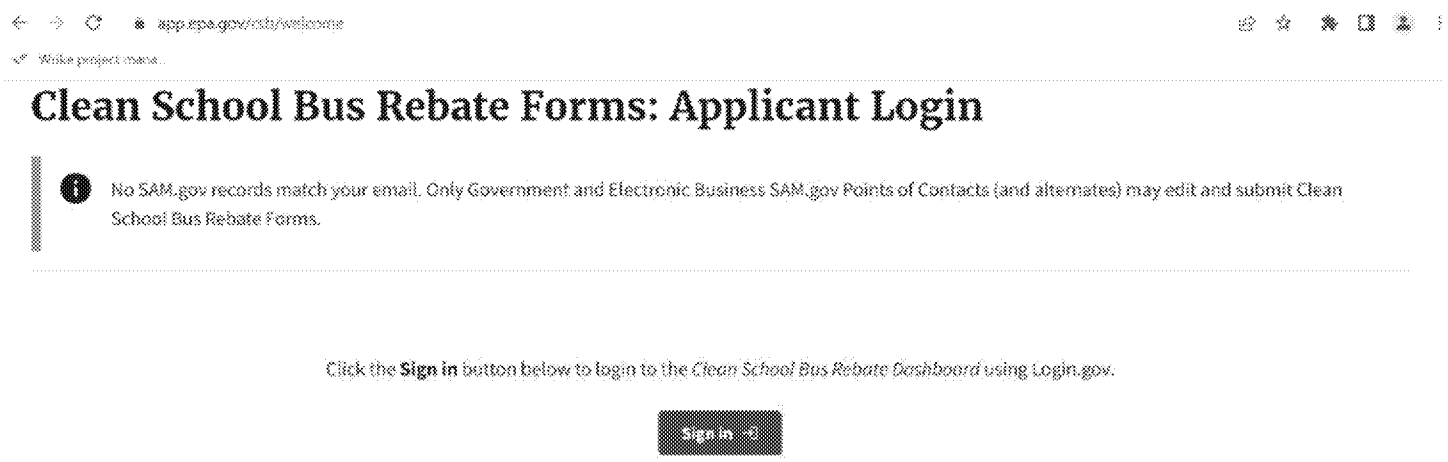
Unique Entity ID: TFKMDMWYZLJ3

CAGE Code: 8HPF7

Physical Address: 46147 7th St W, Lancaster, CA 93534 USA

Expiration Date: Nov 6, 2022

Purpose of Registration: All Awards



Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

From: cleanschoolbus@erg.com [mailto:cleanschoolbus@erg.com]
Sent: Tuesday, August 2, 2022 11:21 AM
To: susannah.song@byd.com
Subject: Thank you for contacting EPA's Clean School Bus Program

Dear Susannah,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered your question below.

Question: *Who is eligible to apply?*
Answer: Eligible entities include:

1. State and local governmental entities that provide bus service, including public school districts.
    a. Public charter schools with an NCES District ID are eligible to apply directly for funding.
    b. Most State governmental entities would not be eligible to apply because few provide school bus service, but some own bus fleets and would be eligible.
2. Eligible contractors - Eligible contractors are for-profit, not-for-profit, or nonprofit entities that have the capacity to (1) sell clean or ZE school buses or related charging or fueling infrastructure to school bus owners or (2) arrange financing for such a sale.
    a. For the purpose of defining an eligible contractor, financing is defined as loans or lease-to-own agreements. For example, school bus dealers and original equipment manufacturers (OEMs) that meet these criteria are eligible contractors.
3. Nonprofit school transportation associations
4. Indian tribes, tribal organizations, or tribally controlled schools responsible for the purchase of school buses or providing school bus service for a Bureau of Indian Affairs (BIA) funded school.

Question: May an OEM apply on behalf of the school district? If so, should the OEM register that school district as a new entity on its SAM.gov account?
Answer: A bus or electric vehicle charger OEM that meet the eligible applicant criteria can apply directly and would need to list the school district that would be served by the new buses on their application. The OEM must notify and receive approval from the participating school district prior to submitting the application. Only the direct applicant needs an active SAM.gov entity registration.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Gordon
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 10/28/2022 4:54:32 PM
To: angel.yin@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Angel,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We are reviewing your question and will contact you with a response as soon as possible.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Megan
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: angel.yin@byd.com <angel.yin@byd.com>
Sent: Thursday, October 27, 2022 2:56 PM
To: cleanschoolbus@erg.com; Maietta, Anthony <maietta.anthony@epa.gov>
Subject: RE: Thank You for Contacting EPA's Clean School Bus Program

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Hi Campbell,

Thanks for the response! I would love to hear more about the internal selection process workings.

1. I would love to know besides prioritizing the school districts on the prioritized list, are there any other criteria or it's a completely lottery based selection?

2. When will the interactive map and excel sheet be released online today?

3. When will the waitlisted school districts be rewarded and notified?

Thanks,

Angel

From: cleanschoolbus@erg.com [mailto:cleanschoolbus@erg.com]
Sent: Wednesday, October 26, 2022 1:12 PM
To: angel.yin@byd.com; Maietta, Anthony <maietta.anthony@epa.gov>
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Angel,

Thank you for your questions about EPA's 2022 Clean School Bus Rebates. We answered your questions below.

Question: *Do applicants need to sign up for the Clean School Bus Program newsletter to receive a notification of whether they were selected for funding or will applicants receive an email?*
Answer: Applicants will receive an email notification if they are selected for funding.

EPA has posted the 2022 Clean School Bus Rebate awardees on the following page: www.epa.gov/cleanschoolbus/awarded-clean-school-bus-program-rebates.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Campbell
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: angel.yin@byd.com <angel.yin@byd.com>
Sent: Tuesday, October 25, 2022 6:35 PM
To: Maietta, Anthony <maietta.anthony@epa.gov>
Cc: CleanSchoolBus <CleanSchoolBus@epa.gov>
Subject: EPA Clean School Bus

Hi Maietta,

This is Angel Yin, Policy Analyst with BYD. We are an Zero Emission vehicle OEM and we've applied for the Clean School Bus rebate on behalf of school district. We received an email this morning saying the school district received the grant. However, I haven't seen any updated on the EPA website or any announcement. I was wondering:

1. Is the awardees being emailed separately starting now gradually?
2. When will there be a full list of awardees be published?

Thanks,

Angel Yin / Policy Analyst

BYD America
1800 S Figueroa St, Los Angeles, CA
(213) 748-3980 x 58668

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 7/28/2022 8:36:44 PM
To: steven.gao@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Steven,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We are reviewing your question and will contact you with a response as soon as possible.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Campbell
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: steven.gao@byd.com <steven.gao@byd.com>
Sent: Thursday, July 28, 2022 3:18 PM
To: CleanSchoolBus <CleanSchoolBus@epa.gov>
Subject: Clean School Bus Program Question regarding BABA from Q&A Document dated July 6, 2022

Dear Clean School Bus team,

Hope this email finds you well.

I'm reaching out regarding a question from the Q&A document that was posted on the website during my market research: https://www.epa.gov/system/files/documents/2022-07/fy22-clean-school-bus-rebate-q-and-a-2022-07-06.pdf

The appendix C on page 22 has an answer regarding BABA as below screenshot shows. My interpretation from below paragraph is that currently, there are no Buy America or Buy American requirements for clean school bus in the project, if any school districts are looking for new battery electric school buses.

C.2: *Are buses and eligible charging infrastructure funded under the 2022 CSB Rebates covered under the Build America, Buy America Act?*

Answer: EPA has determined that school buses are not covered by the Build America, Buy America Act (BABA). EPA is seeking an adjustment period waiver from BABA requirements for charging infrastructure under the 2022 CSB Rebates and is collecting public comments through June 7, 2022. Please visit the following site for more information: https://www.epa.gov/cwsrf/build-america-buy-america-baba-waivers-open-public-comment

This seems also concurs with the program guideline (https://www.epa.gov/system/files/documents/2022-05/420b22025.pdf), page 7 (as below) whereas only mention the spec of the school bus that need to be meet by OEM.

New replacement buses must:

1. Have a battery-electric, CNG, or propane drivetrain[7]
2. Be EPA certified vehicle model year 2021 or newer[8]
3. Have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs or more
4. Not be ordered prior to receiving official notification of selection for EPA funding
5. Be purchased, not leased or leased-to-own
6. Serve the school district listed on the application for at least five years from the date of delivery
7. Meet federal safety standards and be maintained, operated, insured, registered, and charged/fueled according to manufacturer recommendations and state requirements
8. Not be manufactured or retrofitted with, or otherwise have installed, a power unit or other technology that creates air pollution within the school bus, such as an unvented diesel passenger heater
9. Not be purchased or otherwise subsidized with other federal funds. The total of CSB rebate bus funds and other eligible external funds allocated for the bus replacements cannot exceed the cost of the new buses.
10. Upon request, be made available for inspection by EPA or its authorized representatives for 5 years from the date of delivery

---

[7] Biofuels will not be included as an eligible replacement technology for this rebate program. There are no unique biofuels engines or buses at this time. All diesel buses can run on a mix of regular diesel and biodiesel, making it very difficult to ensure that biofuel blends of a certain percentage are used exclusively in the vehicle from the start, much less over the vehicle's lifetime. A vehicle which operates on a biofuels mix may have some small emissions benefits depending on numerous factors, but there is no emissions standards difference between a regular diesel bus and one that may use biofuels as an in-use fuel. Thus, a bus that runs on a biofuel mix will not provide significant environmental benefits beyond the current diesel bus market options. Similarly, there are currently no hydrogen or LNG product offerings so hydrogen and LNG will not be included as eligible replacement technologies for this rebate program.

[8] EPA is not funding the conversion of old school buses to operate on battery-electric, CNG, or propane drivetrains in the 2022 CSB Rebates. EPA Heavy-Duty Vehicle Certification Data is posted here: https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment.

Please kindly let me know if there are any questions.

Thank you very much for your time and kind support.

With Best Regards,

Steven Gao / Marketing Associate

BYD Motors
1800 S Figueroa St, Los Angeles, CA
O: (213) 748 - 3980 ext. 58873
M: (213) 675 - 1285

Message

From: cleanschoolbus@erg.com [cleanschoolbus@erg.com]
Sent: 8/8/2022 6:43:16 PM
To: steven.gao@byd.com
Subject: Thank You for Contacting EPA's Clean School Bus Program

Dear Steven,

Thank you for your question about EPA's 2022 Clean School Bus Rebates. We answered your question below.

Question: *Is there any requirement to buy American made buses or charging infrastructure in the 2022 Clean School Bus Rebates?*
Answer: No. These provisions do not apply to buses. For charging equipment, please refer to the approved Build America, Buy America waiver for the 2022 Clean School Bus Rebates on the following page: https://www.epa.gov/cwsrf/build-america-buy-america-baba-approved-waivers. Also, please note that while this waiver is in effect, we also encourage program participants to pursue domestically-produced equipment wherever possible.

Please see the School Bus Rebates page for the Program Guide, important dates, the Prioritized School District list, and the Questions & Answers document. Please see the Online Rebate Application Information page for prerequisites for accessing the application, resources for using the application, and a link to the application itself.

For more information, please visit the Clean School Bus Program website. Sign up to stay in touch about Clean School Bus Program Funding with the link at the bottom of the page.

Regards,
Campbell
ERG, Contractor to U.S. EPA
EPA's Clean School Bus Program
www.epa.gov/cleanschoolbus

From: steven.gao@byd.com <steven.gao@byd.com>
Sent: Thursday, July 28, 2022 3:18 PM
To: CleanSchoolBus <CleanSchoolBus@epa.gov>
Subject: Clean School Bus Program Question regarding BABA from Q&A Document dated July 6, 2022

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Dear Clean School Bus team,

Hope this email finds you well.

I'm reaching out regarding a question from the Q&A document that was posted on the website during my market research: https://www.epa.gov/system/files/documents/2022-07/fy22-clean-school-bus-rebate-q-and-a-2022-07-06.pdf

The appendix C on page 22 has an answer regarding BABA as below screenshot shows. My interpretation from below paragraph is that currently, there are no Buy America or Buy American requirements for clean school bus in the project, if any school districts are looking for new battery electric school buses.

C.2: *Are buses and eligible charging infrastructure funded under the 2022 CSB Rebates covered under the Build America, Buy America Act?*

Answer: EPA has determined that school buses are not covered by the Build America, Buy America Act (BABA). EPA is seeking an adjustment period waiver from BABA requirements for charging infrastructure under the 2022 CSB Rebates and is collecting public comments through June 7, 2022. Please visit the following site for more information: https://www.epa.gov/cwsrf/build-america-buy-america-baba-waivers-open-public-comment

This seems also concurs with the program guideline (https://www.epa.gov/system/files/documents/2022-05/420b22025.pdf), page 7 (as below) whereas only mention the spec of the school bus that need to be meet by OEM.

New replacement buses must:

1. Have a battery-electric, CNG, or propane drivetrain[7]
2. Be EPA certified vehicle model year 2021 or newer[8]
3. Have a Gross Vehicle Weight Rating (GVWR) of 10,001 lbs or more
4. Not be ordered prior to receiving official notification of selection for EPA funding
5. Be purchased, not leased or leased-to-own
6. Serve the school district listed on the application for at least five years from the date of delivery
7. Meet federal safety standards and be maintained, operated, insured, registered, and charged/fueled according to manufacturer recommendations and state requirements
8. Not be manufactured or retrofitted with, or otherwise have installed, a power unit or other technology that creates air pollution within the school bus, such as an unvented diesel passenger heater
9. Not be purchased or otherwise subsidized with other federal funds. The total of CSB rebate bus funds and other eligible external funds allocated for the bus replacements cannot exceed the cost of the new buses.
10. Upon request, be made available for inspection by EPA or its authorized representatives for 5 years from the date of delivery

[7] Biofuels will not be included as an eligible replacement technology for this rebate program. There are no unique biofuels engines or buses at this time. All diesel buses can run on a mix of regular diesel and biodiesel, making it very difficult to ensure that biofuel blends of a certain percentage are used exclusively in the vehicle from the start, much less over the vehicle's lifetime. A vehicle which operates on a biofuels mix may have some small emissions benefits depending on numerous factors, but there is no emissions standards difference between a regular diesel bus and one that may use biofuels as an in-use fuel. Thus, a bus that runs on a biofuel mix will not provide significant environmental benefits beyond the current diesel bus market options. Similarly, there are currently no hydrogen or LNG product offerings so hydrogen and LNG will not be included as eligible replacement technologies for this rebate program.

[8] EPA is not funding the conversion of old school buses to operate on battery-electric, CNG, or propane drivetrains in the 2022 CSB Rebates. EPA Heavy-Duty Vehicle Certification Data is posted here: https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment.

Please kindly let me know if there are any questions.

Thank you very much for your time and kind support.

With Best Regards,

Steven Gao / Marketing Associate

BYD Motors
1800 S Figueroa St, Los Angeles, CA
O: (213) 748 - 3980 ext. 58873
M: (213) 675 - 1285

Message

From: Moltzen, Michael [Moltzen.Michael@epa.gov]
Sent: 7/22/2022 8:35:07 PM
To: susannah.song@byd.com; CleanSchoolBus [CleanSchoolBus@epa.gov]
CC: michael.tan@byd.com; jason.yan@byd.com; ricardo.morales@byd.com; Maria.mendoza1@byd.com; gerald.farrell@byd.com
Subject: RE: Questions regarding EPA School Bus Funding Application

Hi Susannah,

Thanks for checking in with your questions about Clean School Bus Rebates. I'm looping in our help line (cleanschoolbus@epa.gov). I believe its likely you're an eligible applicant, and will likely need to be registered in sam.gov; however, the school district(s) you're working with likely would not need to be. However, its best to confirm with folks who operate our helpline.

Mike Moltzen, Deputy Director
Transportation and Climate Division
EPA Office of Transportation and Air Quality
(734) 249-2869
Pronouns: he, him, his

From: susannah.song@byd.com <susannah.song@byd.com>
Sent: Thursday, July 21, 2022 2:03 PM
To: Moltzen, Michael <Moltzen.Michael@epa.gov>
Cc: michael.tan@byd.com; jason.yan@byd.com; ricardo.morales@byd.com; Maria.mendoza1@byd.com; gerald.farrell@byd.com
Subject: Questions regarding EPA School Bus Funding Application

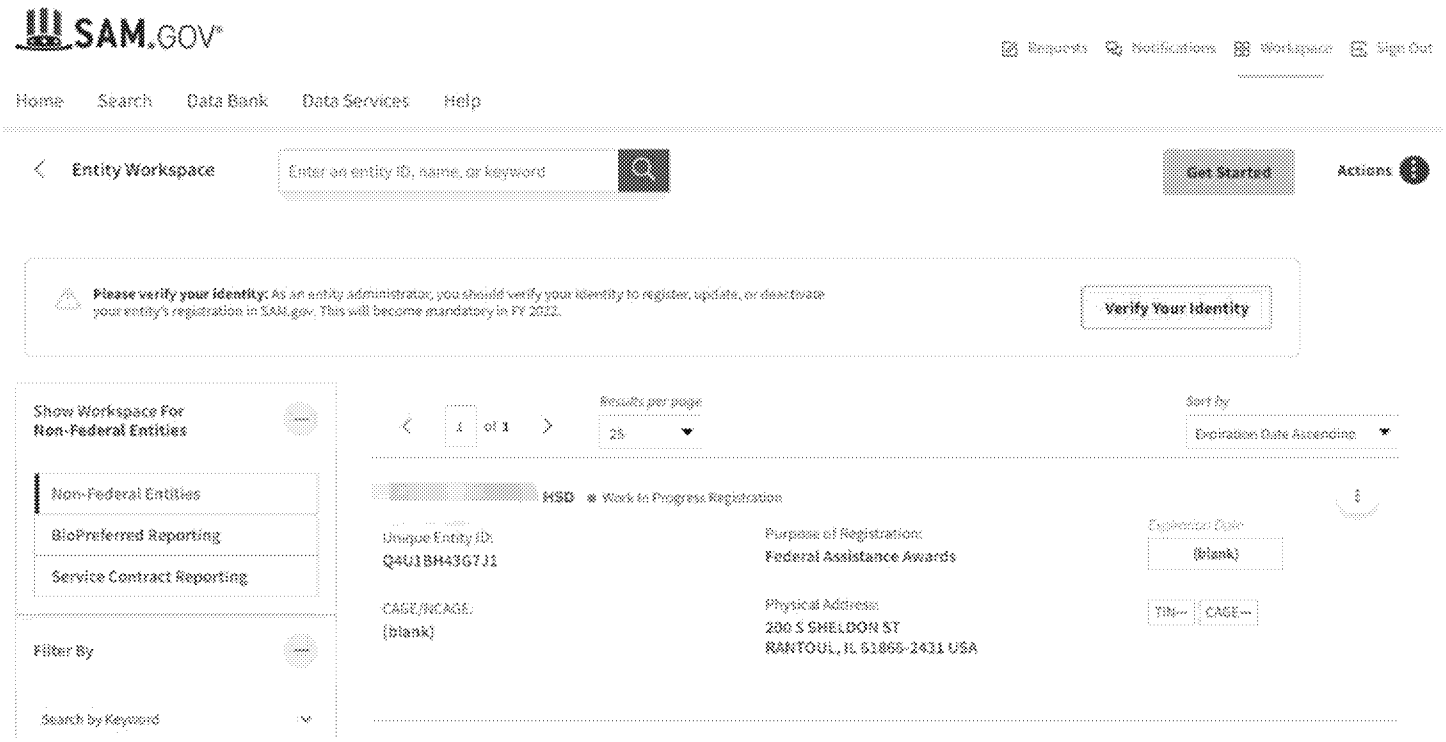
Hello Michael,

Hope you are doing well.

Allow me to introduce myself, I am Susannah Song, with BYD Coach & Bus, a U.S.-based electric vehicle manufacturer. Currently, we are applying for the EPA's new Clean School Bus Program funding on behave of our client (school district) and have some questions regarding the funding application. Hope you could help us to answer, thank you:

1. Is OEM able to apply the funding for the school district?
2. If yes, should we register the school district as a new entity on our sam.gov? (Please see the below image for your reference)
3. If yes, do we need to get all the entity information, including but not limited to financial information, Executive Compensation Questions, Representation and certifications, etc.?

Thank you very much for your time in this effort, we are looking forward to your reply.



Best Regards,

Susannah Song / Business Development Associate

BYD North America
1800 S. Figueroa St, CA 90015
Cell: (646) 377-0690 | Office: (213) 373-9843
Email: Susannah.song@byd.com | en.byd.com

Message

From: Tiffany Finck-Haynes [TFinck-Haynes@smart-union.org]
Sent: 1/19/2022 4:39:24 PM
To: CleanSchoolBus [CleanSchoolBus@epa.gov]
Subject: Recommendations re: EPA Clean School Bus Program
Attachments: EPA Clean School Bus Program Comments_SMART_1.19.2022.pdf

Hello,

On behalf of SMART, the International Association of Sheet Metal, Air, Rail and Transportation Workers Union, please accept our recommendations regarding EPA's Clean School Bus Program.

SMART union members manufacturer EV buses. As EPA develops and designs the Clean School Bus Program, we encourage EPA to incentivize or encourage grant recipients to purchase union made EV buses manufactured with a domestic content threshold of at least 70 percent. Applying these conditions to the program will help the Biden administration meet its climate, labor and

equity goals.

Please let me know if we can provide any further information. We appreciate your consideration of this request.

Best,
Tiffany

Tiffany Finck-Haynes

Government Relations Representative

1750 New York Ave, NW

Suite 600

Washington, DC 20006

tfinck-haynes@smart-union.org

(O) 202-662-0820

(C) 202-717-1945

International Association of Sheet Metal, Air, Rail and Transportation Workers

1750 New York Avenue, NW
Suite 600
Washington, DC 20006

Phone: (202) 662-0843
Fax: (202) 662-0880
jwhite@smart-union.org

James W. White, Jr.
Director of Strategic Campaigns

January 19, 2022

Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

RE: Bipartisan Infrastructure Law Clean School Bus Program

To Whom It May Concern,

On behalf of our thousands of members, the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART) commends Congress and the Biden administration on the passage of the bipartisan infrastructure law. SMART manufacturers EV buses and appreciates that the law provides funding to replace thousands of outdated and environmentally hazardous buses, with clean, zero emission vehicles, including $5 billion for the replacement of existing school buses with clean school buses and zero-emission school buses. As EPA develops and designs the Clean School Bus Program, we encourage EPA to incentivize grant recipients to purchase union made EV buses manufactured with a domestic content threshold of at least 70 percent. Applying these conditions to the program will help the Biden administration meet its climate, labor and equity goals.

SMART is one of North America's most dynamic and diverse unions. In Lancaster, CA, SMART represents all the union employees at Build Your Dreams (BYD) electric bus plant. BYD North America was the first electric bus manufacturer to unionize (with a neutrality/card check agreement), adopt a Community Benefits Agreement and establish training and apprenticeship programs for workers with traditionally high barriers to employment. Through SMART's collaboration with BYD, the company partnered with Antelope Valley College to create a pre-apprenticeship program to develop and train the next generation of workers. BYD also launched an 18-month apprenticeship program to help foster the next generation of leaders. The workforce is predominately women, people of color, and the formerly incarcerated. This facility is a model for the Biden administration's goals of creating union-jobs, achieving racial justice, and tackling climate change.

BYD represents 40 percent of total U.S. electric bus manufacturing capacity in the U.S. Proterra (its competitor) represents 37 percent of the market. BYD buses exceed Federal Transit Administration 'Buy America' requirements, incorporating more than 70 percent U.S. components. BYD has spent more than $100M on parts and components from hundreds of U.S. vendors over the last two years. Additionally, BYD has invested more than $250 million in the U.S. market through its facilities, workers, and partnerships. According to the city of Lancaster, BYD America's presence has led to more than 3,000 additional jobs in the region.
More than 500 BYD EV buses are operating in the U.S., and over 300 more are on order. BYD is also looking to expand its manufacturing space by two million square feet and hire at least 1,000 more workers to enhance its manufacturing capacity in the near future and meet the growing demand of U.S. cities and states for EV buses.

BYD is a model electric bus manufacturer that should be utilized for EPA's Clean School Bus Program. Unfortunately, there is a provision in current law that would not allow the use of federal grant monies to purchase electric transit buses manufactured by BYD. Despite BYD being a publicly traded, American-based manufacturer meeting all federal "Buy American" requirements, with ownership that currently includes both American and

foreign institutional investors, EPA Clean School Bus Program grantees may not be able to purchase BYD EV buses. Due to the fact BYD has a headquarters in China, existing law was crafted in such a way that would exclude companies like BYD that are publicly-traded, and therefore owned by individual shareholders and independent financial institutions, in the ban on federal contracts, even if those companies would satisfy Buy America requirements. Notably, Warren Buffett is one of BYD's largest shareholders. BYD buses sold to U.S. transit systems are manufactured in the U.S. in Lancaster, California utilizing an all-union labor force. All BYD buses manufactured in America exceed federal Buy America requirements.

SMART is grateful for the high road manufacturing careers our members have achieved and believe EPA's Clean School Bus Program can contribute to expanding high road manufacturing careers by incentivizing its grant recipients to purchase union made EV buses manufactured with a domestic content threshold of at least 70 percent. We urge EPA to make an exception and allow BYD buses to qualify for funding under the Clean School Bus Program.

Sincerely,

James White
Director of Strategic Campaigns
International Association of Sheet Metal, Air, Rail and Transportation Workers

Message

From: Riley Ohlson [ROhlson@aamfg.org]
Sent: 8/30/2022 6:02:28 PM
To: CleanSchoolBus [CleanSchoolBus@epa.gov]
Subject: Alliance for American Manufacturing Comments RE: Clean School Bus Program Implementation
Attachments: AAM Comments EPA Clean School Bus Program Implementation 08 30 22.pdf

Please find attached comments from the Alliance for American Manufacturing regarding EPA implementation of the Clean School Bus Program. Please let me know if you have any questions or issues with the attachment.

Thank you,

Riley Ohlson
Vice President for Federal Affairs
Alliance for American Manufacturing
www.americanmanufacturing.org
P: 443.447.4003

ALLIANCE FOR
american
manufacturing

The Alliance for American Manufacturing (AAM) is a non-profit, non-partisan partnership formed in 2007 by some of America's leading manufacturers and the United Steelworkers.

ALLIANCE FOR
american
manufacturing

August 30, 2022

The Honorable Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20004

RE: Build America Buy America Act Requirements of the Clean School Bus Program

Dear Administrator Regan:

The Alliance for American Manufacturing (AAM) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) implementation of the Clean School Bus Program (CSBP) and the Build America, Buy America (BABA) requirements included in the *Infrastructure Investment and Jobs Act* (IIJA). A robust domestic content requirement for all school bus purchases financed by this program is required by law. Despite its May 14, 2022, statutory implementation deadline, AAM is perplexed that EPA has not yet applied BABA to this program and urges immediate corrective action.

About AAM
AAM is a non-profit, non-partisan partnership formed in 2007 by some of America's leading manufacturers and the United Steelworkers. Our mission is to strengthen American manufacturing and create new private-sector jobs through smart public policies. We believe that an innovative and growing manufacturing base is vital to America's economic and national security, as well as to providing good jobs for future generations. AAM achieves its mission through research, public education, advocacy, strategic communications, and coalition building around the issues that matter most to America's manufacturers and workers.

The Build America, Buy America Requirement Applies to ALL Federally Assisted Infrastructure, Including the Clean School Bus Program
The BABA provisions in the IIJA require that all federally assisted infrastructure projects be completed with iron, steel, manufactured products, and construction materials that are produced in the United States. Our nation has a once-in-a-generation opportunity to strengthen supply chains while rebuilding our public works infrastructure. Reinvesting tax dollars here at home creates American jobs, invests in goods produced under strong environmental and workplace safety standards, and protects our economic and national security. It is now the job of federal departments and agencies to fully implement these Congressionally mandated, comprehensive Buy America policies.

In Section 70912 of BABA, "infrastructure" is defined as inclusive of "public transportation" and a wide range of other forms of infrastructure. Congress clearly intended for BABA to apply broadly to all forms of federally assisted infrastructure so that departments and agencies would have no doubts as to its scope of coverage. The BABA law does not afford departments and agencies

711 D Street, NW, 3rd Floor • Washington, DC 20004 • 202-393-3430 • americanmanufacturing.org

ALLIANCE FOR american manufacturing

the authority to determine at their own discretion whether BABA applies to federally assisted infrastructure programs under their jurisdiction that are clearly covered under the law.

It is thus deeply perplexing that EPA makes no mention of the clear BABA requirements for federal assistance infrastructure in its January 2022 Initial Implementation Report to Congress.[1] Instead, the report states that the program "will support domestic manufacturing and American jobs" as there are "facilities across the county that produce zero-emission and clean school buses." Furthermore, it is concerning that EPA merely identifies "the impact on domestic manufacturing jobs" as one of its many award criteria but is explicit that it will not be given "preference" over other individual criterion – which includes "lowest overall cost of bus replacement."

Excerpt on Page 3 of EPA's "Bipartisan Infrastructure Law Clean School Bus Program: Initial Implementation Report to Congress"

In making awards for low- or zero-emission clean school buses, EPA will consider the following criteria without preference to any individual criterion:

- Lowest overall cost of bus replacement;
- Local conditions, including the length of bus routes and weather conditions;
- The impact on domestic manufacturing jobs, to include parts, components, and assembly, including the job impact in underserved communities;
- Technologies that most reduce emissions; and
- Whether funds will bring new technologies to scale or promote cost parity between old technology and new technology, particularly for production in the United States.

EPA's acknowledgement of the importance of domestic manufacturing, while laudable, does not meet the BABA requirements and would apparently allow grant recipients to purchase school buses that do not meet the clear BABA requirement that iron, steel, manufactured products, and construction materials be produced in the United States. If EPA continues to implement the CSBP without requiring recipients to adhere to the BABA policy, the agency will continue to be in clear violation of the BABA law, which took effect on May 14, 2022.

Moreover, EPA's Initial Implementation Report and its CSBP implementation to date also appears to conflict with the Office of Management and Budget's (OMB) initial BABA implementation guidance.[2] OMB is clear that "infrastructure" includes "public transportation" and guides agencies to "interpret the term 'infrastructure' broadly and consider the definition provided as illustrative and not exhaustive." Agencies are directed to consider "whether the project will serve a public function, including whether the project is publicly owned and operated" or "privately operated on behalf of the public," indicating these types of projects have "greater indicia of infrastructure."

[1] "Bipartisan Infrastructure Law Clean School Bus Program Initial Implementation Report to Congress," EPA. January 2022. Available at: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1014098.pdf.
[2] Memorandum for Heads of Executive Departments and Agencies. Office of Management and Budget. April 18, 2022. Available at: https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-11.pdf.

711 D Street, NW, 3rd Floor • Washington, DC 20004 • 202-393-3430 • americanmanufacturing.org

ALLIANCE FOR american manufacturing

Federally assisted purchases of school buses to safely transport our nation's students to schools unequivocally meets this standard. AAM finds it disconcerting that EPA failed to identify the BABA requirement in its report and did not outline the steps it is taking to implement the law.

EPA Must Begin BABA Implementation and Should Use FTA's Rolling Stock Buy America Requirements as a Starting Point for the CSBP

AAM urges EPA to immediately take corrective action to begin applying the BABA policy in accordance with the express terms of the law and the guidance provided by OMB. Moreover, AAM urges EPA to implement the CSBP in a manner that ensures these procurements support the expansion of all stages of manufacturing, including upstream inputs that are critical for the completion of a final product assembly or manufacture. The longstanding application of Buy America requirements to federally assisted rolling stock purchases – including transit buses – provides a well-established and useful model for the EPA to implement the CSBP.

The Federal Transit Administration's (FTA) Buy America policy framework should be used as a starting point to set the CSBP on a course to be compliant with the BABA law. The FTA's Buy America policy requires final assembly in the United States and that 70 percent of a vehicle's component content be domestic. Buy America application to rolling stock, particularly transit buses, has incentivized investments in U.S. productive capacity and domestic employment while ensuring timely delivery of rolling stock to states and localities.

When EPA begins the required implementation of BABA to the CSBP, AAM looks forward to expanding upon the following recommendations to improve upon FTA's Buy America policy:

- First, to ensure that an energy storage system (i.e., the battery) is truly "American made," the EPA should place an emphasis on a resilient domestic battery supply chain, including both raw materials and subcomponent content, while avoiding loopholes that allow foreign content to be treated as domestic. The Administration's government-wide initiatives on advanced battery technologies and electric vehicle charging infrastructure will be undermined if an energy storage system or its charging equipment consisting of wholly imported content is permitted to qualify as domestically produced for purposes of Buy America compliance.

- Second, because energy storage systems account for an outsized percentage of the overall cost of components of an electric bus, EPA should adopt a robust BABA requirement that ensures that the steel, aluminum, tires, glass and other component materials and parts are produced in the United States – meeting the strong origin standards in the BABA law. The outsized cost of an energy storage system should not "crowd out" other domestically produced inputs used to construct the vehicle. This undesirable outcome would be detrimental to U.S. manufacturers and their workers.

- Finally, any use of BABA's statutory waiver authority must be narrow, conditional, and time limited to ensure timely investments in critical infrastructure without undermining domestic producers or chilling the market signal for domestic investment.

EPA Should Consider Additional Criteria that Safeguard U.S. Taxpayer Dollars from Use on Rolling Stock Supplied by State-Owned Enterprises

711 D Street, NW, 3rd Floor • Washington, DC 20004 • 202-393-3430 • americanmanufacturing.org

ALLIANCE FOR american manufacturing

AAM urges EPA to address the disruption caused by the entry of China's state-owned, -controlled, and -subsidized firms into U.S. public infrastructure markets. In recent years, companies with connections to the People's Republic of China, People's Liberation Army, and restricted entities including Huawei have set up final assembly facilities in the United States as a means of accessing federally assisted contracts for transit electric buses.[3] In response, Congress in 2019 passed the Transit Infrastructure Vehicle Security Act into law, prohibiting the use of FTA dollars to purchase rolling stock from Chinese state-owned, -controlled or -subsidized firms. AAM urges the EPA to adopt these same prohibitions in the CSBP for the protection of U.S. supply chains and national security. The EPA should take this action now to ensure that assistance recipients are not impacted by future limitations on programmatic assistance as such policies are harmonized across federal financial assistance programs.

Conclusion

The United States has a once-in-a-generation opportunity to implement policies designed to strengthen critical transportation supply chains. Not only have existing supply chains deteriorated, but the United States stands at the precipice of an historic transition in our transportation sector to clean energy vehicles. Congress was clear in BABA that federally assisted infrastructure spending must prioritize the industrial supply chain that underpins our infrastructure, including the next generation of battery cells and packs that will power electric buses and other transit vehicles.

Moreover, BABA supports the EPA's larger mission of reducing carbon emissions and pollution, as U.S. production of steel and other key inputs used in rolling stock supply chains are among the least-carbon intensive in the world. It makes little sense to pursue policies to reduce our carbon footprint by relying on imports produced in polluting factories outside the United States.

A robust domestic content requirement for all school bus purchases financed by this program is required by law. Despite its May 14, 2022, statutory implementation deadline, AAM is perplexed that EPA has not yet applied BABA to this program and urges immediate corrective action.

Thank you for the opportunity share comments on this matter.

Alliance for American Manufacturing
711 D Street NW, 3rd Floor
Washington, DC 20004
Email: sboos@aamfg.org

[3] Building the China Dream: BYD & China's Grand Strategic Offensive. Bruyere and Picarsic. Radarlock. October 2019.

Message

From: Heidi Sickler [hsickler@amplypower.com]
Sent: 2/7/2022 9:46:39 PM
To: CleanSchoolBus [CleanSchoolBus@epa.gov]
Subject: AMPLY Power's Comments on USEPA's Clean School Bus Program
Attachments: AMPLY_Comments on USEPA's CSB Program_February 6, 2022.pdf

AMPLY Power, Inc. respectfully submits the attached comments to the U.S. Environmental Protection Agency on the Clean School Bus Program. Given the unprecedented level of need and demand for electric school bus fleets, USEPA has a unique opportunity to help school districts and fleet operators accelerate school bus electrification.
AMPLY Power is a comprehensive charging and energy management provider for electric vehicle fleets focused on reducing costs and environmental impact. We offer a proven, scalable ecosystem of cloud-based software, onsite hardware, and customer-centric service to simplify charging operations for fleets operating trucks, buses, vans, and light-duty vehicles. Our hardware- and bus-agnostic approach is intended to be a scalable platform for light-, medium- and heavy-duty fleets to electrify 100 percent on an accelerated basis.

Thank you for your consideration,

Heidi

Heidi Sickler
Director of Policy • **AMPLY Power**
hsickler@amplypower.com
335 E. Middlefield Road, Mountain View, CA 94043
amplypower.com | LinkedIn | Twitter
AMPLY named to 2021 Global Cleantech 100

AMPLY POWER

AMPLY Power's comments on:

U.S. Environmental Protection Agency's Clean School Bus Program

TO:	**cleanschoolbus@epa.gov** **US EPA Clean School Bus Program** **U.S. Environmental Protection Agency** **1200 Pennsylvania Avenue** **Washington, DC 20450**

Table of Contents

Headquartered at 335 E. Middlefield Rd., Mountain View, CA 94043. www.amplypower.com

Cover Letter

AMPLY Power, Inc. ("AMPLY") respectfully submits its comments to the U.S. Environmental Protection Agency's ("USEPA") on the Clean School Bus ("CSB") Program. Given the unprecedented level of need and demand for electric school bus fleets, USEPA has a unique opportunity to help school districts and fleet operators accelerate school bus electrification.

AMPLY Power is a comprehensive charging and energy management provider for electric vehicle fleets focused on reducing costs and environmental impact. We offer a proven, scalable ecosystem of cloud-based software, onsite hardware, and customer-centric service to simplify charging operations for fleets operating trucks, buses, vans, and light-duty vehicles. Our hardware- and bus-agnostic approach is intended to be a scalable platform for light-, medium- and heavy-duty fleets to electrify 100 percent on an accelerated basis.

OMEGA is a cloud-based charge management platform, developed and operated by AMPLY, which leverages machine learning and artificial intelligence to offload everything a fleet operator needs to do to effectively manage and optimize their electric vehicle ("EV") fueling. OMEGA powers the management of large and small EV fleets (patents-pending) in real time to ensure service level and lowest cost.

Through these comments, we hope to educate and reinforce that the goal of fleets and fleet operators is to (i) ensure a high level of service of these mission critical vehicles delivering people, goods, or services; and (ii) minimize total cost of ownership ("TCO") of the assets through their lifetime (which spans from 3-year for light duty to 12-20 years for heavy-duty). At a minimum, for 'production-scale' fleet electrification, the (i) service level must be on-par with fossil fuel, and (ii) the TCO must be equivalent. Electrification isn't 'done' at install/go-live, it lasts through the vehicle lifecycle and beyond. AMPLY is focused on providing fleet readiness (service level) and fueling optimization (economics), while also fitting in to the fleet management systems (telematics, scheduling, routing, asset tracking). We hope to show the value of charge and energy management to achieve reduced operating costs for 'electric fuel' and cast a spotlight on uptime of the charging infrastructure to deliver ongoing service level.
On behalf of AMPLY, we look forward to working with USEPA on the development of the Clean School Bus Program.

AMPLY Power

For questions, please contact:

Heidi Sickler
Director of Policy
hsickler@amplypower.com

AMPLY Power
Headquartered at 335 E. Middlefield Road
Mountain View, CA 94043
www.amplypower.com

AMPLY's Comments

California's school transportation system is the largest mass transportation system in the state. Yet, approximately 54 percent of California's 21,000 school bus fleet is diesel. More than half of today's diesel school buses have been in service for over a decade according to the USEPA. Some of the oldest and most polluting school bus fleets are found in rural school districts that have less access to funding sources. School buses transport young children who are vulnerable to diesel emissions. According to the California Air Resources Board ("CARB"), these older buses produce twice as much pollution per mile as semi-trucks; consequently endangering the health of young students at a time when their respiratory systems are developing. These fleets drive three times the distance of an average driver so the Greenhouse Gas ("GHG") emissions reduction benefits of electrifying school buses is three times greater than the benefits of electrifying passenger vehicles. The good news is that more and more school districts are eager to electrify their bus fleets. Moreover, polls show that nearly two thirds of voters support providing grants to school districts to purchase zero-emission school buses.

However, many school districts and school bus operators face a number of challenges such as infrastructure build-out and navigating utility tariffs for fuel costs when trying to adopt EV solutions for their communities,. In a 2018 survey by Greenbiz and UPS, fleet operators cited high cost and complex infrastructure as main deterrents in expanding their electric truck and bus pilots to full deployment. At AMPLY, we have also seen that insufficient public charging facilities and slow utility interconnection processes are significant barriers to school bus fleet electrification. Most EVs operated by commercial fleet operators today charge exclusively at their depot or hub using charging equipment they own, primarily due to the lack of available public charging. According to AMPLY's most recent survey results, the cost of charging infrastructure is one of the most critical barriers to implementation. This challenge can be directly addressed with various managed charging solutions, such as AMPLY's, which can lower both upfront and ongoing costs for infrastructure and charging. AMPLY Power's Charging-as-a-Service solution gives school bus fleet operators, including school districts and contractors, predictable energy rates, optimizing charging and prioritizing lowest-cost energy. For school bus contractors and school districts, AMPLY is also demonstrating a vehicle-to-grid ("V2G") solution to increase resiliency and further reduce energy costs at their site. Working with our partners to balance energy demand and supply, AMPLY's work for our California and New York-based customers ensures they will be able to scale their electrification efforts. AMPLY respectfully offers the following recommendations on the implementation of the USEPA's CSB Program:

I. Fund Electric Vehicle Charging Infrastructure for CSB projects

President Biden's historic investment in zero-emission vehicle (ZEV) technology is a clear indication of the urgent need to scale up and broaden access to clean transportation for all. There is an equally growing and urgent need to scale up and broaden access to EV charging infrastructure for electric school buses, transit buses and truck fleets. These essential medium- and heavy-duty fleets of last resort mainly use in-depot charging. However, the U.S. Department of Transportation's $5 billion National Electric Vehicle Formula Program and $2.5 billion competitive grant program are restricted to public charging infrastructure projects sited along federally designated alternative fueling corridors. Electric school bus fleets could scale more quickly if they had access to federal dollars to meet their in-depot charging needs. That is why it is critical that the CSB Program include funding for EV charging infrastructure for school bus fleets. The infrastructure deployment timeline is not decreasing so investment in infrastructure should precede vehicle financing. This is especially true at a time when perceived infrastructure cost may be preventing fleets from moving forward with electrification. For example, while some fleet operators expect infrastructure to account for more than 50 percent of total project costs, other operators are unsure about infrastructure costs or have not.

Considered it. AMPLY has seen that the cost of infrastructure varies greatly across fleets of all sizes and types and even across fleets that are the same size and type. Given how much these costs can add up, it is essential that school districts and fleet operators understand these costs and plan their EV charging infrastructure accordingly.

II. Allow School Bus Contractors to Qualify for CSB and DERA Grants and Loans

Contractors can deploy electric school buses at much higher rates and volumes than school district. They also operate in most regions and cities impacted by poor air quality. In 2018, the top three school bus contractors deployed nearly 80,000 school buses and transported nearly five million students.

III. Fund Repowers

Repower rebates are currently unavailable through California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, but they are available in New York. Repowers are also less costly than full bus conversions ($350,000 for a zero-emission bus versus $125,000 for a repower) and could potentially accelerate school bus conversions because they require fewer components and therefore less reliance on unpredictable supply chains. Aside from waiting on federal funding to become available for zero-emission school buses, EV production across the industry has struggled due to supply chain issues, especially when it comes to microchips.

IV. Allocate All $5 billion for Zero-Emission School Buses

Pollution from diesel buses is one of the largest sources of toxic air pollution and causes respiratory diseases. More than half of today's diesel school buses have been in service for over a decade, according to the USEPA. In California, there are 25,000 school buses on our roads, the majority are diesel. These older buses produce twice as much pollution and diesel exhaust per mile as semi-trucks, consequently endangering the health, attendance and academic performance of young students at a time when their respiratory systems are developing.

AMPLY strongly supports allocating all $5 billion towards USDOE rebates or grants for zero-emission school buses and charging infrastructure. Battery electric buses are more economical: On a life-cycle basis, electric school buses beat diesel buses on cost. Yet, approximately 54 percent of California's 21,000 school bus fleet is diesel. Hybrid and electric school buses currently constitute only one percent of the inventory. Older school buses are more polluting, with the deterioration of Particulate Matter filters due to aging. This exposes children, and sensitive population groups, to more emissions. The oldest category of buses in the inventory are 1977 to 1986 model year school buses. CARB found 125 diesel school buses in the model years 1978-1988, half of which are located in Disadvantaged Communities.

AMPLY Power strongly supports a fully zero-emission CSB Program because it will help improve local air quality by closing the existing funding gap to replace polluting diesel school buses with clean, zero-emission school buses. With a 12-year lifespan, each zero-emission bus can eliminate ten tons of nitrogen oxides and 350 pounds of diesel particulate matter, which contains over 40 toxic air contaminants. A record high of 41 percent of California's total Greenhouse Gas emissions come from the transportation sector. For these reason, AMPLY respectfully urges USEPA to only fund zero-emission school buses through the CSB Program.

V. Apply Learnings of the Clean School Bus Program to Truck Electrification

The learnings from deploying thousands of electric school buses will help the private sector deploy electric trucks because their learning can be duplicated in the private sector. Through our work with fleet operators, AMPLY has seen the growing benefits of fleet electrification, including lower total cost of ownership, a reduction in local air pollution in frontline communities, and lower Greenhouse Gas emissions. The percentage of fleets planning to deploy EVs within the next year has more than doubled over the last six months. We also know that high-mileage electric fleets drive more than three times the average distance of non-commercial vehicles so they have the potential to reduce GHG emissions per passenger by up to 50 percent per mile.

VI. Allow the Use of Grants to Pay Back Loans

CSB and DERA programs should allow school districts and fleet operators to pay back loans with federal and state grant funding to apply towards the principal of loans. This option will help prevent stifling the adoption rate and accelerate adoption of zero-emission school buses. School districts and school bus contractors may prefer low-interest loans over grant funding if they have the option to pay back loans with federal and state grant funding.

VII. Fund Renewable Energy Sources and Energy Storage to Power Electric School Bus Charging

Fleet operators, including local school districts, have the ability to marry their solar operations to their electric vehicles via a microgrid, battery, and charge management. In California, school districts have acquired on-site solar generation in parallel to transitioning their fleets to electric. In parallel, California has experienced several challenges to its grid system that could decrease the acceleration of electrification due to concerns over reliability. USEPA now has the opportunity to lead in cleantech, electrification and good green jobs by designing a CSB Program that would enable school bus fleet operators and school districts to deploy shovel-ready, resilient solutions for optimal fleet operations. Additionally, microgrid-enabled electric fleets will reduce demand on our power grids, reduce the overall carbon intensity of fleet operations, minimize total cost of ownership, and aid disadvantaged and low-income communities while seeking to achieve our energy goals.

The solution is a modularized and scalable deployment for mission critical electric transportation. It integrates grid-tied and self-islanding solar/storage, vehicle-to-grid ("V2G") chargers, microgrid resiliency, and community emergency response in the event of grid outage, wrapped in situationally aware control software. AMPLY's AI-driven managed Charge Management Software ("CMS") ensures infrastructure performance/uptime, minimizes demand and expensive time-of-use ("TOU") periods thus lowering electric "refueling" costs, and maximizes consumption from renewable generation. It will also work to ensure that charging infrastructure does not negatively impact grid stability. AMPLY's solution is shovel-ready and scalable, directly addresses the Biden Administration's goals to electrify transportation and reduce carbon intensity, and ensures reliable, robust fleet operations and grid resilience.

Because of the on-site solar generation and storage as well as managed charging to flatten out the power demand curve, this solution requires smaller utility service upgrades or no service upgrades at all. This template design can be rapidly scaled across school districts throughout California and other states.

VIII. Coordination between USEPA, State Energy Offices and State Air Resources Boards

There is an ongoing high demand for school bus electrification funding. The largest sources of school bus funding in California have been oversubscribed. There is currently not enough money to fund all of the eligible school bus electrification projects. School bus replacement costs range from $130,000 to about $200,000 for conventional school bus replacement including diesel, CNG, low-NOx CNG and propane. Zero-emission battery-electric school bus costs range from $270,000 to over $400,000 depending on the bus type and options (excluding infrastructure costs). The higher up-front costs of electric school buses means that a fixed amount of funding can buy fewer school buses. The California Energy Commission (CEC) has funded 236 buses with $75 million in one-time Proposition 39 funding for the retrofit or replacement of school buses. The $75 million in funding is being used exclusively for the purchase of battery-electric school buses, and this amount is being supplemented with more than $14 million in CEC Clean Transportation Program funds to provide the necessary charging infrastructure to operate the buses.

Given the high demand for funding, USEPA should minimize unnecessary delays to implement the CSB Program. Considering that many states are already engaged in electric school bus planning and deployment work, they should have a readily available knowledge-base. AMPLY also strongly suggests that USDOE encourage State Energy Offices to collaborate closely with USEPA, USDOE and USDOT to build upon and leverage best practices developed under the Volkswagen settlement. For example, in California, we have 12 programs that fund electric school bus deployment, all of which are oversubscribed. These programs include CARB's Lower-Emission School Bus Program, the CEC's School Bus Replacement Program, CARB's Rural School Bus Pilot Project and CARB's Clean Mobility for Schools Pilot Project.

These investment programs have undergone extensive stakeholder engagement and have identified best practices for effectively deploying electric school buses in areas of highest need and for use cases which will have the most immediate impact on local air quality. AMPLY encourages USEPA to coordinate with State Energy Commissions and State Air Resources Boards to ensure that these federal CSB Program dollars are used efficiently to fill funding gaps, and to complement existing investments.

IX. Connections to the Electric Grid, including Electric Distribution Upgrades, and Alignment with Electric Distribution Interconnection Processes

Making the process of connecting to the grid simpler and more transparent for fleet electrification customers is also essential if we are to meet our state and federal EV deployment goals. The National EV Summit principles also call for "electric utilities, regulators, charging providers, and stakeholders to work together to accelerate transportation electrification in a way that supports the electric grid and benefits all utility customers." In California, the Public Utilities Commission (CPUC) has authorized a total of $732.8 million for medium- and heavy-duty fleet electrification. However, only $44.6 million has been spent to date. One of the main barriers to fleet electrification is the nine to 13 month grid interconnection process. For example, medium- and heavy-duty vehicle fleet operators report that they have to have their EV deployment very firm in order to execute a utility contract, leaving very little flexibility or incentive to get more EVs after their initial contract. Uncertain timing and application process for utility service upgrades are delaying or discourage EV infrastructure installation. Modification to the current utility processes can help to streamline EV charging interconnection and ensure chargers are installed at the rate needed to meet the state's EV adoption and GHG reduction goals.

Electric fleet operators continue to report delays with utility electric vehicle ("EV") charging infrastructure interconnections and service upgrade requests due to unforeseen requirements and costs.

Specifically, fleet operators report that they have to have their EV deployment very firm in order to execute a contract, leaving very little flexibility or incentive to get more EVs after the initial contract. To that end, AMPLY supports a requirement that any utility near-term transportation electrification proposal include a streamlined and standardized service upgrade request process to help ensure the timely interconnection of EV infrastructure. Similarly, AMPLY respectfully encourages USEPA to design a CSB Program that incentivizes and expedites school bus electrification proposals with streamlined and standardized interconnection and service upgrade request processes. AMPLY respectfully submits the following recommendations to expedite, streamline and standardize the utility service upgrade request and interconnection process:

- *Single Point of Contact Per Customer Portfolio* (not a single point of contact per project): Customers and Developers to interface directly with a single IOU project manager, regardless of project type or region.

- *Clearly Defined Requirements/Obligations for Customers*: Unforeseen requirements and costs from IOUs can be the cause of service upgrade request delays, including unexpected customer documentation signoffs, which can cause confusion over customer obligations.

- *Standardized and Committed Turnaround Timelines*: Like Rule 21 and Distributed Energy Resources and Vehicle-to-Grid Integration, IOUs should have an overall goal to shorten implementation to six months through efficiencies gained implementing 1 and 2 above.

- *Utility Engineering Studies*: Make standards for when IOU engineering review of the distribution system impacts are required. For example, it is not triggered if <500 kW of EVSE is installed.

X. Coordination between USEPA and USDOE on MOU for V2X Collaboration

Electric school buses have the potential to be a load balancing tool, especially during the warmest days of summer when schools are not in session. Fleets of grid-connected school buses could potentially deliver power back to utilities during peak demand periods through vehicle-to-grid ("V2G") integration technology. For Logan Bus, AMPLY will be demonstrating a V2G solution to increase resiliency and further reduce energy costs at their site. Via grant funding from NYSERDA, and vehicle support from UES, Logan Bus was able to convert five Type C diesel school buses to electric. AMPLY Power provides comprehensive charge management for this new electric school bus fleet, allowing Logan Bus to actively monitor all aspects of their vehicles and charging infrastructure through our OMEGA software platform. Working with CPower to balance energy demand and supply, AMPLY's work for Logan Bus ensures they will be able to scale their electrification efforts.

Although electric school bus pilot projects continue to demonstrate the efficacy of V2G, there is still a higher cost for bidirectional charging devices along with more implementation complexity. To address these V2G challenges, USDOE is developing a Memorandum of Understanding (MOU) to Establish the Vehicle-to-Everything Collaboration. The intent of USDOE's V2X Collaboration is to accelerate and enable bidirectional electric vehicle integration into the electrical grid, initially by collecting and analyzing data from the demonstration bidirectional charging stations, and preparing analyses to evaluate the business case for V2X applications. Eligible use cases include fleet vehicles, passenger vehicles and refuse trucks. The goal of the V2X Collaboration is to evaluate whether V2X infrastructure can generate a bankable revenue stream. USDOE envisions awarding grants to national laboratories to validate different duty cycles and use cases. AMPLY encourages USEPA to collaborate with USDOE on identifying potential school bus projects that could help demonstrate V2G technology as a load balancing tool.

About AMPLY

Founded in 2018, we are headquartered at 335 E Middlefield Road, Mountain View, CA 94043 and have offices in Los Angeles, CA, and Brooklyn, NY. AMPLY brings together a Team with a wealth of experience, both technically and from a successful business history. The combined technical experience in electricity, utility interconnection, EVSE charging hardware infrastructure, and cloud computing is the exact skill set needed to solve the issues fleet owners face when electrifying their fleets.

In December 2021, we announced that AMPLY Power was acquired by bp. This acquisition is a significant milestone for our company, marking a step-change in our growth path, while maintaining our customer-focused delivery. It is also an exciting moment for bp, recognizing the importance of fleet charging, in addition to bp's existing portfolio of UK and European EV charging business. AMPLY Power will continue to operate as a distinct entity, with our management and team, our customers, our partners, and our efforts to decarbonize transportation; we're proud of the work accomplished to this point, validated by bp's acquisition. Together, AMPLY Power is well positioned for a new scale of innovation, expansion, and fleet electrification projects. The clean energy horizon has never looked brighter.

Partnerships in the EV Ecosystem

Transportation Electrification Partnership: Convened by the Los Angeles Cleantech Incubator, is an unprecedented multi-year partnership among local, regional, and state stakeholders to accelerate transportation electrification and zero-emission goods movement in the Greater Los Angeles region in advance of the 2028 Olympic and Paralympic Games. The 30+ partners, including AMPLY Power, are working together to advance bold targets, policies and pilots that are equity-driven, create quality jobs, and grow the economy.

Zero Emission Transportation Association (ZETA): AMPLY is one of the founding members of ZETA, which is the first industry-backed coalition of its kind advocating for the full adoption of electric vehicles (EV) by 2030, which will create hundreds of thousands of new jobs, secure American global EV manufacturing leadership, dramatically improve public health and significantly reduce carbon pollution.

Advanced Energy Economy (AEE): AEE is a national association of businesses that are making the energy we use secure, clean, and affordable. AEE works to accelerate the move to 100% clean energy and electrified transportation in the U.S. Advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting energy needs today and tomorrow.

Electrification Coalition Business Council (ECBC): AMPLY is one of the inaugural members on the ECBC, which will work with the Electrification Coalition to advance policies and programs that support the deployment of electric vehicles and charging infrastructure on a mass scale in order to overcome the economic, public health and national security challenges associated with the American transportation sector's dependence on oil.

CALSTART: AMPLY is a member of CALSTART, a national nonprofit whose model for change has proven effective to accelerate high-tech clean transportation, create jobs, and cut air pollution and oil imports and curbs climate change. CALSTART accelerates the pace of technology and is a market building organization.

Center for Transportation and the Environment (CTE): Among our memberships, AMPLY is a member of the Center for Transportation and the Environment, which works to improve the health of our climate and communities by bringing people together to develop and commercialize clean, efficient, and sustainable transportation technologies.

Charging Stations: AMPLY supports best-of-breed standards-based EV charging stations from the largest manufacturers. AMPLY is hardware agnostic to charging infrastructure hardware brands, as we continuously source and collaborate with the latest and best high-efficiency, low-loss chargers that offer exceptional reliability. We do this while improving on our machine learning software algorithms to drive up charging efficiencies. This allows us to assist in scaling up electrification efforts as new and updated hardware come to market. EVSE OEMs may have their own software but will not be able to manage each other or later EVSE that selected for usage.

Our compatibility list is continually growing - today's compatibility matrix for AMPLY's OMEGA is:

Micro-grid compatibility: OMEGA is operating in various configurations at Fleet depots today. This includes many EV charger makes and models; multi-source power with generators and (soon to go-live) with solar; and full micro-grid design in process with various large-scale vendors (including Tesla Energy, Schneider Electric, Siemens, and Grid-Scape Solutions).

OCPP 1.6 and OpenADR compliance: AMPLY's software solution, OMEGA, is compliant with OCPP 1.6 as well as other charge management systems communications protocols such as OppCharge, ISO 15118, MQTT, and OpenADR. Our open standards practices are compliant with J1772, CCS, CHAdeMO, J3068, pantograph, J2954 (wireless) and multiple electric/safety standards.

Telematics and Route Management Systems: OMEGA is tested and certified for all major vehicle manufacturers and heterogeneous fleets. Our partners in telematics systems, include IO Controls, Geotab, VTS, and Viriciti; and Scheduling/Route Management Systems partners Optibus, Tripshot and VTS.

US Gain: AMPLY has also secured a strategic partnership with U.S. Gain. (see U.S. Gain press release February 22, 2021). U.S. Gain is a leader in the development and distribution of alternative fuel and renewable energy. Together, the companies will offer turnkey, cost-effective charging solutions for the growing number of electrified fleets throughout the U.S. and Canada.

Charging Services Approach

Charging-as-a-Service

AMPLY arranges a **Charging-as-a-Service** ("CaaS") agreement for fleets to finance the charging infrastructure needed for the expected deployment of battery-electric vehicles ("BEVs"). AMPLY believes that the CaaS model generates the best total cost of ownership (TCO) for customers. AMPLY provides CaaS such that the customer has **no upfront capital expense.** The amortized capital expenses, operating expenses, and energy expenses are rolled into one **monthly usage fee**, which the customer pays to AMPLY in arrears. The fee is based directly on the usage of the CaaS during the preceding month.

AMPLY's CaaS is supplied through a long-term electric fuel supply agreement. This can be between five and fifteen years in length, although longer periods / extensions can be considered. In our innovative charging and energy services agreement with ATN, the term is twenty years. This guarantees a service level of re-charging vehicles for an upfront known price per kilowatt hour.

AMPLY's CaaS includes:

- Engineering and Design
- EVSE Procurement
- Construction and Installation
- Operations and Maintenance
- Automated Charging Operations
- Fueling Cost Management
- Operations and Maintenance
- Fuel Credit Management
- Clean Energy Sourcing
- Demand Response and Grid Services

Charge Management Service Approach

AMPLY OMEGA is a cloud-based, multi-tenant system that allows AMPLY to monitor our customer fleets, with the security of individual customer encryption and customer data ownership. The AMPLY OMEGA system includes a dashboard, OMEGA Command Center, allowing the fleet operator to view in real-time the EV charging processes in action, day or night. It can be viewed from any web browser and is optimized for mobile devices such as iPad to allow a roaming supervisor to get up-to-the second information while on the move.

OMEGA Command Center provides a managed EV charging service (software cloud-based technology, backed by AMPLY service personnel) to:

- enhance reliability of the EV chargers and the EV charging process
- optimize to ensure e-fueling of every vehicle every day
- minimizing e-fuel cost of energy through time-of-use business rules, demand charge management, and energy market signals
- drive visibility to the uptime of vehicles and chargers
- proactive monitoring and notification of vehicle plug-ins, working chargers, and charging operations
- reporting in real-time and summary form on e-fuel activities and costs

Through this platform, AMPLY provides a set of services (see above). Charge scheduling and optimization performed by the Command Center Platform is designed to be hands-off without any direct user management. Integration with fleet management suites and telematics help enable dynamic adjustments when needed.

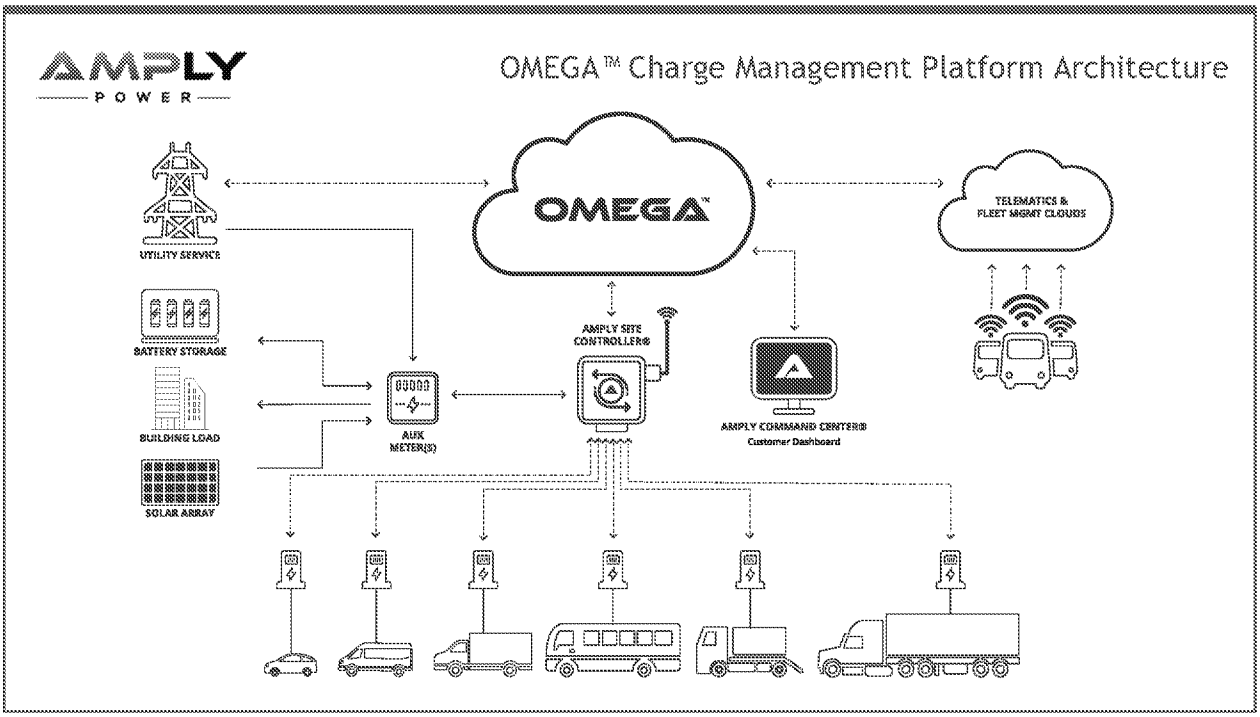


Figure 1: AMPLY Charge Management Architecture of EV CaaS technology platform

The Command Center allows AMPLY to monitor our customer fleets, with the security of individual customer encryption and customer data ownership. The Command Center system includes a dashboard allowing the fleet operator to view in real-time the EV charging processes in action, day or night. It can be viewed from any web browser and is optimized for mobile devices such as iPad to allow a roaming supervisor to get up-to-the second information while on the move.

The Command Center's business rules will be architected to coincide with the cheapest time-of-use rates, while simultaneously minimizing any demand charge amounts monthly and ensuring that the vehicles required state-of-charge (SOC) is reached before starting the next shift. The Command Center business rules will stagger the charging load (wherever possible) to minimize (a) the peak demand charge, and (b) the capacity impact on the utility grid.

AMPLY employs a cloud and edge device solution, a site-controller that communicates with our cloud-hosted software, as depicted in our software architecture image above. The AMPLY Site Controller (ASC) is a proprietary edge device that sits in the electrical panel and communicates with all the components of electric fleet operations. As part of AMPLY's OMEGA CMS, the ASC automatically manages the load, ensuring power draw stays within a threshold, and maximizes load profile while helping to avoid costly utility service upgrades. Data and telemetry are collected at the edge, and then communicated to the cloud through AMPLY's internet gateway. If requested, AMPLY can also add a rule to optimize charging to allow for the most carbon-neutral energy to be used for e-fuel (i.e., charge when the energy in the grid is most green).

OMEGA Charge Management Software

AMPLY has developed and operates its own charge management software, OMEGA, that optimizes power flow and guarantees charging performance. We view our cloud-based OMEGA Charge Management System as a major competitive advantage on the marketplace, and it directly enables our Charging-as-a-Service business.

The OMEGA Command Center is a mobile-optimized, user friendly dashboard that allows you to manage your fleet from anywhere. The OMEGA Command Center provides real-time visibility into your electric vehicles, chargers, power usage, and critical alerts, and offers compliance and emissions reporting.

Figure 2: OMEGA Command Center Fleet and Operations Dashboard

OMEGA Charge Management System and OMEGA Command Center allow the management of large EV fleets real time (second by second), effectively at lowest cost of EV charging, and satisfying the customer required duty cycles and charging schedules, at the same time responding to grid signals to reach best grid stabilization and utilization. There are no fixed arrival times needed: the Command Center only needs to know the expected arrival times, the AMPLY Optimizer recalculates every time a vehicle arrives - or any other event in the system occurs, including model predictive control forecasting. Our patented algorithm assures the determined goal will be achieved with minimum cost under the given constraints and tariff.

Charge Management Capabilities

Schedule Charging: The Command Center's business rules will be architected to ensure a certain state-of-charge is achieved by an established time, such as pullout. The Command Center business rules will also stagger the charging load (wherever possible) to minimize (a) the peak demand charge, and (b) the capacity impact on the utility grid.

Reduce Utility Costs: EV re-charging is performed over-night and during the mid-day rest periods of the customer's vehicles. The Command Center's business rules will be architected to coincide with the

cheapest time-of-use rates, while simultaneously minimizing any demand charge amounts monthly and ensuring that the vehicles required state-of-charge (SOC) is reached before starting the next shift.

Analyze Trends: A regular wellness check and report is generated and reviewed with customers to cover performance history, operational changes detected, trouble tickets addressed, and recommendations for the customer to maintain or improve operations to support reliable service.
Optimize Charging Level: Dynamic constraints can be considered when performing charge optimization to respect minimum charge levels. We can support not charging beyond a specific SOC but can work with the customer to evaluate the benefits and risks in doing so. Additional data that the Command Center Platform has access to (e.g., vehicle telematics) may enable charge schedules to help maximize the lifespan and health of energy storage modules.
Respond to Charging Interruptions: The Site Controller recognizes these conditions in real time and re-optimizes the charge management schedule to adjust accordingly on the fly.
Respond to Changing Assignments: Prioritization and ordering is supported and respected. With integration or knowledge of route dispatch times the Site Controller will ensure that EVs designated to leave first are ready to go, regardless of lane positioning.
Set a Code-Compliant Site Power Limit: Maximum peak demand at a site and panel level is supported to allow for service and panel upgrade deferrals.
Automated Regular Reporting: Our platform can regularly generate standard reports to support operational requirements or custom requests. A popular use of this today is LCFS reports.
High Availability Setup Options: Support mission critical setups to mitigate and enable prolonged connectivity outages, manual overrides, N-1 Site Controller equipment failure.
Remote Diagnostics Enabled: Low level troubleshooting of EVSEs, telemetry inputs, and site integrations can be done remotely by our trained support engineers to reduce downtime and time to diagnose issues.
OTA Updates: New features and upgrades can be shipped OTA without a truck roll. Enhancements and bug fixes can be deployed without unnecessary delay.

Data and Reporting

OMEGA reports are based on data sources, including Vehicle data, Charger data, meter data, fleet management system (where applicable and integrated).

During each charging transaction, the following can be communicated as charging data: average demand (kW) per session, maximum demand (kW) per session, utility tariff, total dollar amount charged to the operator for the charging session, demand charge ($/kW), vehicle make, vehicle model, vehicle year, and vehicle type (BEV, PHEV). For each charging transaction, AMPLY captures: Charger ID, customer ID, Charging start time/date, Charging end time/date, Charging load profiles, kWh's of electricity delivered, and peak kW during the charge transaction. AMPLY collects this information automatically through cellular, wi-fi, and ethernet communications methods.

OMEGA generates reports and can automatically file the reports required by various government and utility funded programs. Among the programs that the Command Center is approved or verified for data reporting requirements:

- CARB LCFS (Low Carbon Fuel Standard)
- PG&E EV Fleet
- SCE Charge Ready program
- SDG&E Charge program

AMPLY's Goals and Aspirations

Electrification has reached a turning point due to consumer demand for zero-emission solutions, policy updates, and cost parity with ICE vehicles. Companies focused on electrification have expanded rapidly, leading to major initiatives from both incumbent OEMs and startups. The immense growth in the passenger EV market has been accompanied by a massive demand for fleet electrification solutions across all vehicle sectors.

While fleet electrification is inevitable and a focus of incumbent OEMs, there is no solution in the market today that adequately addresses the charging and energy needs of end users. OEMs are not able to deliver this solution, given they are already playing catch-up on electrifying their fleets. The leader in fleet charging must have fully managed solutions that enable customers to deploy fleets without hassle, are optimized for low energy costs, are interoperable with existing workflow functions, and guarantee reliability and performance. AMPLY address each of these obstacles through our charge management platform.

At its inception, AMPLY focused heavily on transit and school bus markets, given the speed at which these vehicles transitioned to electrification. However, the company has recently expanded into new segments and is now engaged in even more vehicle sectors. Now and in the upcoming years, AMPLY is well-positioned to capture the massive, adjacent markets in heavy-duty, medium-duty, light-duty, delivery, and shared passenger fleets. In the longer-term, AMPLY aims to serve all segments of the electric vehicle fleet market, with an increasing mix towards rideshare (such as TNCs), and delivery customers. AMPLY will be able to offer unique, end-to-end solutions customized for each fleet's specific needs and agnostic to their existing or preferred hardware.

AMPLY does not benchmark against how many chargers we have deployed, but rather we spotlight our uptime, reliability, and energy savings. What distinguishes AMPLY from other competitors is that we track these metrics on a month-to-month basis, and we have yet to encounter another charging provider that does. Customers do not focus on the number of chargers deployed, but rather they care about the efficiency and reliability of the system. AMPLY is uniquely positioned in that we are the only charge management service providers who focus on these issues while hitting these reliability metrics. AMPLY listens to what our customers prioritize.

Reference Projects

AMPLY presents several case studies of successful operationalization of their services:

TRI DELTA TRANSIT

Tri Delta Transit provides over 3,000,000 trips each year to a population of over 250,000 residents in the 225 square miles of Eastern Contra Costa County in Northern California. Tri Delta began its electric bus program with the purchase of four battery-electric buses from Proterra and BYD in 2018, in support of California's goal to transition transit agencies to 100% zero-emission by 2040. The initial charging plan Tri Delta developed for their new EVs led to demand charges and higher-than-projected energy costs. To solve this, Tri Delta sought out AMPLY to optimize their bills and manage their charging going forward. Tri Delta's original intent was to have drivers or depot personnel initiate charging of the electric buses at the end of each shift, without awareness of utility rate fluctuations like demand charges and time-of-use charts. Consequently, their new energy bills were significantly higher than anticipated. Additionally, Tri Delta was experiencing intermittent outages without notification, which created operational disruptions.

To address this problem, Tri Delta partnered with AMPLY to reduce costs and improve service. After implementing AMPLY's secure cloud-based Charge Management System, Tri Delta was able to reduce per kilowatt-hour costs by approximately 40%. Moreover, use of AMPLY's software instilled confidence in Tri Delta to scale electric operations and procure additional electric buses. AMPLY expects savings to increase as Tri Delta Transit expands its electric bus fleet in the future.

AMPLY also assisted Tri Delta in navigating the confusing and complicated process of generating revenue from Low Carbon Fuel Standard (LCFS) credits. Leveraging AMPLY's knowledge and experience with the LCFS program, AMPLY supported Tri Delta by reporting its energy consumption, generating carbon credits and monetizing them. This significantly improved the total cost of ownership for Tri Delta Transit's growing EV fleet.

AMPLY has worked with ViriCiti at this customer site. ViriCiti provides information from its telematics system to AMPLY's OMEGA charge management system to fully manage their BEBs.

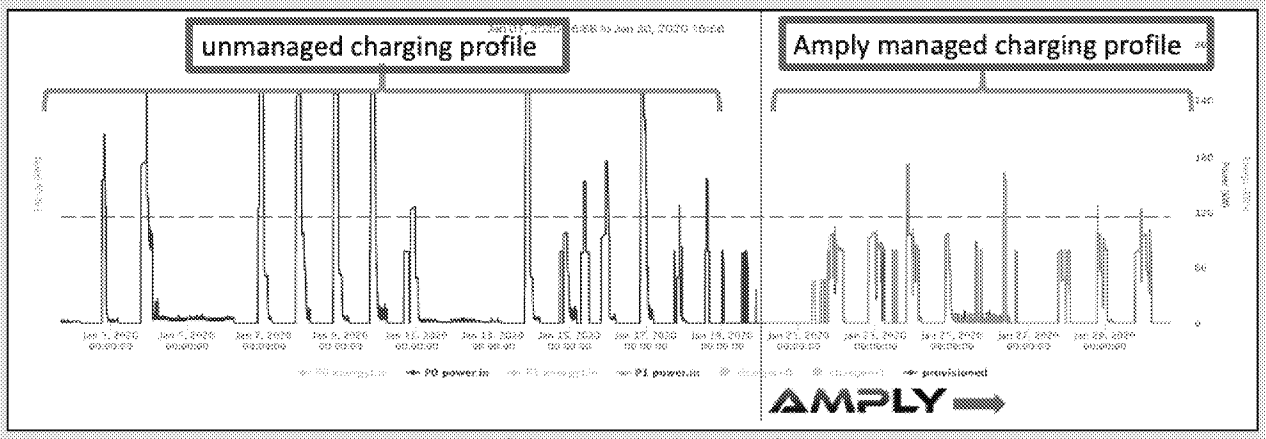


Figure 3: Energy Graph from Tri-Delta depicting Charge Management

Contact: Steve Ponte | 925.754.6622 | sponte@eecta.org
Project Partners: BYD | Proterra | ViriCi

SOLANO COUNTY TRANSIT

SolTrans (Solano County Transit) provides local public transportation and Solano Express fixed routes, complementary paratransit, and subsidized Lyft programs in south Solano County, California.

In support of California's Innovative Clean Transit regulation, SolTrans began incorporating electric buses into their fleet, which now consists of 44% non-diesel vehicles. To reduce costs, ensure consistent vehicle uptime, and manage the charging and fuel needs of their diverse fleet, SolTrans enlisted AMPLY Power's Charge Management Services.

To optimize fueling costs, SolTrans leverages AMPLY's cloud-based smart charging system, OMEGA, which monitors the vehicle charging status and power levels in real-time. AMPLY's proprietary algorithms minimize utility demand and navigate time-of-use rate structures to prioritize lowest-cost energy. With this in place, SolTrans benefits from AMPLY's 99.99% vehicle uptime and awareness of other energy use in the depot's operations.

To address the challenge presented with SolTrans' fleet of multiple vehicle types, AMPLY operates its software in conjunction with the fueling of SolTrans buses that run on Compressed Natural Gas (CNG). When the CNG compressors turn on, AMPLY Power immediately reduces or suspends the EV charging stations to ensure that the 15-minute power will not increase electricity demand costs. AMPLY is the first to manage total fuel costs across vehicle types in this way.

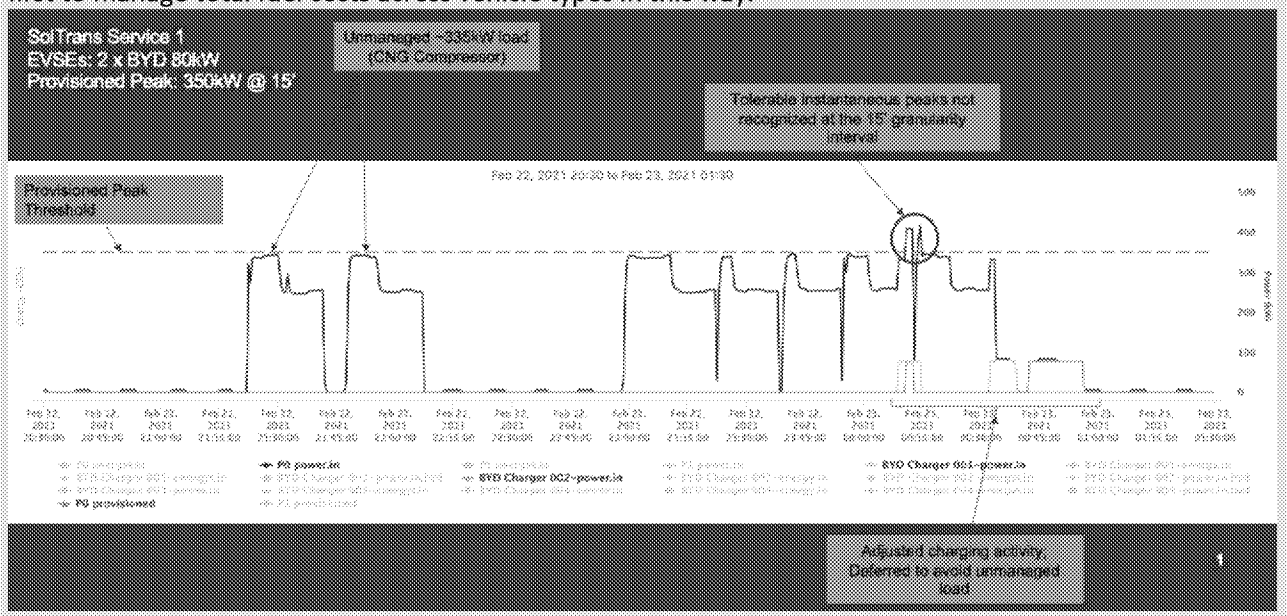


Figure 4: Peak Demand Management at Soltrans by OMEGA

"The AMPLY Power team helped us understand how to collectively control our energy costs while still ensuring all of our electric and CNG buses are fueled and ready to serve our community. AMPLY's technology is helping us transition to zero-emission by 2032." (from **Error! Hyperlink reference not valid.**)

Contact: Pat Car | 707.656.2012 | pat@soltransride.com

Project Partners: Bay Area Air Quality Management District (BAAQMD)

LOGAN BUS COMPANY

As the largest school bus provider for the New York City Department of Education, Logan Bus operates over 2,500 school buses across multiple counties in the greater New York City area.

New York State's Climate Leadership and Community Protection Act mandates the state have a zero-emissions transportation sector by 2040. In effort to fulfill that mandate, Logan Bus partnered with AMPLY on a demonstration project. Funded by NYSERDA, the project showcases innovative concepts for EV charging infrastructure and accelerates the use of electric school buses.

Improving air quality and demonstrating environmental stewardship to children was top of mind for Logan Bus entering this project. Via grant funding from New York State Energy Research and Development Agency, and vehicle support from UES, Logan Bus was able to convert five Class C diesel school buses to electric.

Figure 3: Logan Bus Site Photo

AMPLY Power provides comprehensive charge management for the new EV fleet, allowing Logan Bus to monitor all aspects of their vehicles and charging infrastructure with our OMEGA software platform. The new buses will start serving students for the 2021-2022 academic school year.

Many school districts and school bus fleet operators face a number of challenges when trying to adopt electric vehicle solutions for their communities, such as infrastructure build-out and navigating utility tariffs for fuel costs. AMPLY Power's Charging-as-a-Service solution gives Logan Bus predictable energy rates, optimizing charging and prioritizing lowest-cost energy.

For Logan Bus, AMPLY will also be demonstrating a vehicle-to-grid solution to increase resiliency and further reduce energy costs at their site. Working with CPower to balance energy demand and supply, AMPLY's work for Logan Bus ensures they will be able to scale their electrification efforts.

Contact: Jason Zimbler | 212.971.5342 ext. 3351 | jason.zimbler@nyserda.ny.gov

Project Partners: NYSERDA | UES | CPower | Rhombus | ConEdison

PALERMO UNION SCHOOL DISTRICT

Palermo Union School District is located in the northern part of California's Sacramento Valley, in Butte County, and serves over 1,200 students in grades K-8. Thanks in part to grant funding with a focus on improving air quality in rural school districts that often lack funding, Palermo purchased five electric school buses to kickstart its zero-emission commitment. To ensure lower operating and fuel costs, Palermo recruited AMPLY to manage charging for its new EV fleet.

AMPLY successfully installed six new chargers at Palermo's facility. The scope of AMPLY's work included all aspects of the project from design and engineering to go-live startup operations and contracted Charge Management Services (CMS) with no upfront costs to Palermo. AMPLY's services for Palermo go past installation and CMS to include supporting the sourcing of the final funding to secure the project, warranty coverage, guaranteed uptime, a resilience plan, and energy bill management through 2026.

Through AMPLY's fully-managed, turnkey charging services, Palermo has contracted an energy rate of $0.10/kWh, which is half of the area's potential unmanaged charging electricity rate of $0.20/kWh. This lower energy rate means Palermo is effectively paying $1.19 a gallon to power its vehicles - a full 50% lower than their previous electricity costs from unmanaged EV charging. Based on the early success, Palermo has requested AMPLY help them expand the fleet and charging infrastructure.

Contact: Carlos Aguilar | 530.864.8619 | caguilar@palermok8.org

Project Partners: Lion Electric | Blue Bird | PG&E | Butte County AQMD

HAWAIIAN ELECTRIC COMPANY, (HECO)

Operating for the last 130 years, Hawaiian Electric Company (HECO) provides power to 95% of the state's 1.4 million residents on the islands of O'ahu, Maui, Hawai'i Island, Lāna'i and Moloka'i.

AMPLY Power partnered with HECO on their pilot project, managing charging infrastructure for four of its electric vehicles, as the initial step in electrifying their passenger fleet. AMPLY's involvement will help inform the utility on how to appropriately scale and reach their goal of a fully electric fleet by 2035.

AMPLY's suite of services for HECO include a unique element - AMPLY customized its partnership to utilize OpenADR, a demand response technology, to optimize vehicles charging on the system. Certified by the OpenADR Alliance, AMPLY's cloud-management software platform, OMEGA, uses secure, two-way OpenADR communication specifications. With the software, the utility can turn the electric vehicles charging on its grid into a resource that can respond to load demands in real-time

Hawaiian Electric has reduced their CO_2e emissions by 23% over the last ten years. With their commitment to sustainability, HECO has amassed 968 MW of solar capacity, setting a 34.5% consolidated renewable portfolio standard in 2020. HECO also set an internal initiative to fully electrify its passenger fleet by 2035, and sought a partner who understood their energy mix to optimize charging of its EVs. HECO enlisted AMPLY on a pilot to manage charging infrastructure for four of its light-duty vehicles.

Project Partners: Elemental Excelerator | Geotab |Kia | OpenADR

MANHATTAN BEER

Manhattan Beer Distributors is the fourth largest beer distributor and the single largest market beer distributor in the U.S., with headquarters in New York City, NY. As the first company in the Northeast to convert their diesel fleet trucks to compressed natural gas (CNG), Manhattan Beer is proactive in minimizing their carbon footprint. With their continued green initiative and partnership with Volvo, they are now transitioning into electric vehicles. The missing piece for their new EV fleet was filled by AMPLY's OMEGA charge management software.

Manhattan Beer continues to lower their carbon footprint by investing in fleet sustainability with Volvo's VNR electric trucks. Volvo provided the physical infrastructure needed to create and use an electric vehicle fleet, but AMPLY's OMEGA software sweetened the deal by providing a way to manage the system. With AMPLY's OMEGA and Volvo's VNR trucks, Manhattan Beer will see both their carbon footprint and expenses lower

Manhattan Beer eases into operating electrical vehicles with the purchase of five Volvo VNR Class 8 trucks. As they progressively plan their path towards electrifying their entire fleet, AMPLY's OMEGA will be right alongside. With our vision of a gasoline-free world, Manhattan Beer shares the same dream as us. AMPLY's OMEGA will scale alongside their fleet as they continue to add Volvo VNRs — keeping costs down and no significant changes from the management of five vehicles.

Project Partners: Volvo

RED HOOK TERMINAL

Red Hook is a terminal, stevedore, and cross harbor barge operator with two facilities in the Port of NY/NJ complex. To achieve its emissions reductions, Red Hook purchased ten BYD 8Y electric yard tractors, and in doing so, became the largest fleet of heavy-duty electric trucks operating on the US East Coast. As the tractors were getting ready to deploy at Red Hook's intermodal yard in Port Newark, NJ, Red Hook engaged AMPLY Power for charge management services to optimize the charging of their fleet of electric yard tractors.

Unfamiliar with the myriad of elements in their new EV landscape, Red Hook realized the need for management of charging their electric tractors. With fluctuating utility charging rates in mind— which can shift dramatically hour-by-hour, Red Hook sought AMPLY's services to optimize their fleet charging. AMPLY's charge management software, OMEGA, solves this problem by prioritizing lowest-cost energy, nearly eliminating the uncertainty that comes from highly variable energy expenses.

AMPLY further eased Red Hook's transition to electric vehicles by seamlessly integrating with their existing infrastructure - which includes telematics software and chargers supplied by BYD. AMPLY's Site Controller hardware "speaks" directly to Red Hook's other vendors and products. It then communicates all the necessary data from these entities to the AMPLY OMEGA cloud, ensuring critical fleet information is visible to fleet operators via their OMEGA Command Center dashboard.

AMPLY's OMEGA software supports Red Hook's fleet operators by providing the necessary data points for successful operations, automatically pinging them whenever there are issues with their power, vehicles, or charging infrastructure. With AMPLY OMEGA CMS, Red Hook's operators can spend less time watching over their fleets to make sure they are functioning properly during the day.

Message

From: michael.tan@byd.com [michael.tan@byd.com]
Sent: 6/3/2022 7:12:39 PM
To: CleanSchoolBus [CleanSchoolBus@epa.gov]
CC: Patrick.duan@byd.com; stella.li@byd.com
Subject: EPA CSB FAQs, Webinars, technical support, Rebate programs from BYD
Attachments: BYD_Bus_2022_Cutsheets_Electric-SchoolBus-TypeA_R3.28.pdf; BYD_Type_D_Cutsheet_4.22.pdf

Dear Karl,

How are you ? I am excited to watch your webinars on June 2nd , it's great program to bring zero emission to our next generations.

My name is Michael Tan from BYD US, we are the largest electric vehicle manufacturer in China, with market cap about 150 Billon USD, one of key shareholder is Warren Buffet, the key point is that we also have manufacturer facilities based on Lancaster city , mainly focus on electric bus, especially for electric school buses, with annual production capacity 1500 units and hired 800 employees locally.

In order to participate this green program , I here attached our electric school bus specification as for your reference, I would like have a chance to meet you with our engineer team, to check all the technical details in order to full fit all requirements of CSB program, also get to known more deeply for the federal and state level of policies, BYD have the same mission with EPA to bring the zero emission technologies to our next generation, hope we can work tightly with EPA to make this come true , thanks.

Looking forward to your reply.

Michael Tan / Regional Sales Director

BYD North America
1800 S Figueroa St, Los Angeles, CA 90015
(213) 748-3980 ext. 58857

BYD **TYPE A**

BATTERY ELECTRIC • ZERO EMISSIONS • BUILT IN AMERICA

TYPE A ELECTRIC SCHOOL BUS | ELECTRIC & ECO-FRIENDLY

HIGHEST BATTERY CAPACITY

SAFEST BATTERY TECHNOLOGY

UP TO 60% LOWER MAINTENANCE AND ENERGY COSTS

UV DISINFECTANT SANITATION OPTIONS

VEHICLE-TO-GRID TECHNOLOGY[4]

PROPRIETARY DRIVETRAIN TECHNOLOGY

ELECTRONIC STABILITY CONTROL

ANTI-BULLYING SAFEGUARD CHILDREN'S SEATS

ANTI-COLLISION TECHNOLOGY

BYD

Build Your Dreams®

BYD COACH & BUS
46147 BYD Blvd. Lancaster, CA 93534
en.byd.com

BYD **TYPE A**

TYPE A ELECTRIC SCHOOL BUS

DIMENSIONS

Length	26.7 ft / 24.6 ft (Opt.) / 22.9 ft (Opt.)
Width	96 in.
Height	128 in.
Wheelbase	185 in.
Curb Weight	17,030 lb.
GVWR	21,500 lb.
Passenger Seats	Up to 30
Wheelchair Area	Optional

PERFORMANCE

Top Speed	65 mph
Max Gradeability	10% (≥10 mph) / 2.5% (≥40 mph)
Range[1]	105 miles
Turning Radius	25.9 ft
Approach / Departure Angle	≥20° / ≥10°

CHASSIS

Front Axle	Fangsheng
Drive Axle	Fangsheng
Suspension	Leaf Spring
Brakes	Front & rear disc-brakes, EBS + ESC
Tires	215/75R17.5

POWERTRAIN

Motor Type	AC Synchronous
Max Power	160 kW
Max Torque	1000 N·m
Battery Type	BYD LFP Battery
Battery Capacity[2]	Nameplate 156 kWh / Usable 141 kWh
Charging Type	AC–J1772 & DC–CCS Combo
Charging Capacity	19.2 kW AC / 110 kW DC
Charging Time[3]	7.5-8 hr AC / 1.5 hr DC

Notes:

All information based on the latest data available at the time of printing. Final specs subject to change at production.

1. **Variables affecting range include air temperature, weather, grade,** speed, driver habits and use of air conditioning and heating.
2. Initial battery capacity shown. May decrease with time and use.
3. **Battery age and outside ambient temperature affect charging times.**
4. An option in the future

03.22

BYD TYPE D

BATTERY ELECTRIC • ZERO EMISSIONS • BUILT IN AMERICA

ELECTRIC SCHOOL BUS | ELECTRIC & ECO-FRIENDLY

HIGHEST BATTERY CAPACITY

SAFEST BATTERY TECHNOLOGY

UP TO 60% LOWER MAINTENANCE AND ENERGY COSTS

UV DISINFECTANT SANITATION OPTIONS

VEHICLE-TO-GRID TECHNOLOGY[4]

PROPRIETARY DRIVETRAIN TECHNOLOGY

ELECTRONIC STABILITY CONTROL

ANTI-BULLYING SAFEGUARD CHILDREN'S SEATS

ANTI-COLLISION TECHNOLOGY

BYD COACH & BUS
46147 BYD Blvd. Lancaster, CA 93534
en.byd.com

BYD **TYPE D**

ELECTRIC SCHOOL BUS

DIMENSIONS

Length	36.2 ft / 38.5 ft / 40.5 ft
Width	101.6 in.
Height	131.5 in.
Wheelbase	274 in.
Curb Weight	28,880 lb.
GVWR	39,153 lb.
Passenger Seats	Up to 84 (Wheelchair Area Optional)

PERFORMANCE

Top Speed	65 mph
Max Gradeability	20%
Range[1]	Up to 155 miles
Turning Radius	34.3 ft / 35.4 ft / 37.8 ft
Approach / Departure Angle	8.3° / 9°

CHASSIS

Front Axle	ZF
Rear Drive Axle	BYD in-wheel drive axle
Suspension	Air suspension with mechanical leveling valves
Brakes	Front & rear disc-brakes, ABS
Tires	305/70R22.5

POWERTRAIN

Motor Type	AC Synchronous
Max Power	150 kW×2
Max Torque	550 N·m×2
Battery Type	Iron Phosphate
Battery Capacity[2]	Nameplate 255 kWh / Usable 230 kWh
Charging Type	AC–J1772 & DC–CCS Combo
Charging Capacity	19.2 kW / 110 kW
Charging Time[3]	11.9–12.4 hr / 2.1–2.6 hr

Notes:

All information based on the latest data available at the time of printing. Final specs subject to change at production.

1. **Variables affecting range include air temperature, weather, grade,** speed, driver habits and use of air conditioning and heating.
2. Initial battery capacity shown. May decrease with time and use.
3. **Battery age and outside ambient temperature affect charging times.**
4. An option in the future.

04.22